PROPOSED CHANGES APPLICATION REPORT

Drax Bioenergy with Carbon Capture and Storage

The Planning Act 2008, National Infrastructure Planning Advice Note Sixteen: 'How to request a change which may be material ('AN16')', and the Infrastructure Planning (Compulsory Acquisition) Regulations 2010

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Term	Definition
Cable	Below ground (i.e. electricity cable, telecommunications cable)
Driving Compound	Works area where trenchless construction method machinery (auger / horizontal directional drilling (HDD) machine) will be launched.
FCA	Floodplain Compensation Area required to mitigate against the minor loss of floodplain due to construction of the Proposed Scheme within the Drax Power Station Site.
Line	Above ground line i.e. electricity line, telecommunications line
OHL1	11kV overhead line crossing the A645 once, owned by Northern Powergrid
OHL2	11kV overhead line crossing Rawcliffe Road once, owned by Northern Powergrid
Open Cut Construction	Term used to describe open cut and fill construction method to install underground cables
Open Cut Compounds	Works area where the open cut method machinery will be located
Receptor Compound	Works area where trenchless construction method machinery (auger / HDD machine) will be received
TCL1	Telecommunications line crossing Rawcliffe Road twice, owned by Openreach
The Lines	All overhead lines (i.e. OHL1, OHL2 and TCL1)
Trenchless Construction	Term used to describe either auger boring or HDD or equivalent trenchless construction method used to install underground cables.

EXECUTIVE SUMMARY

This report provides information to support a request for the Examining Authority (the 'ExA') to consider two proposed minor changes to the Drax Power Limited's (the 'Applicant') application for development consent (the 'Application') for the Drax Bioenergy with Carbon Capture and Storage ('BECCS') project (the 'Proposed Scheme'), and to accept these changes into the Examination process for the Application.

This report has been prepared with regard to paragraphs 109 to 115 of the Department for Communities and Local Government's Guidance *Planning Act 2008: Guidance for the examination of applications for development consent* (**the 'Guidance'**) and the Planning Inspectorate's *Advice Note 16: How to request a change which may be material (***'Advice Note 16'***)* and constitutes Step 4 of the process described in Advice Note 16 for requesting a change to an application being a written change request asking the Examining Authority to examine the changed application. It contains the information as required by Figure 3 of that Advice Note 16 (as shown under paragraph 1.1.6), which are addressed as follows:

1. A clear description of the proposed changes, including any new/altered works and any new/altered ancillary matters.
2. A statement setting out the rationale and pressing need for making the changes with reference to the Examination Guidance, any relevant National Policy Statement(s) as appropriate and any other important and relevant matters.
3. A full schedule of all application documents and plans listing consequential revisions to each document and plan or a 'no change' annotation, with extracts of the most important documents included within the application.
4. An update of any consents/licences required and whether (given the proposed changes to the application) there will be any impediment to securing the consents/licences before the Examination is concluded.
5. A track changed version of the part of the draft DCO showing relevant changes for each proposed change, and track changed extracts of the draft Explanatory Memorandum.
6. Given that Proposed Change 2 involves land being added to the Order Limits over which it is proposed to exercise powers of compulsory acquisition of rights ('the CA Additional Land') and, to date, consents have not been able to be obtained from all persons with an interest in the CA Additional Land (although discussions are ongoing), the Infrastructure Planning (Compulsory Acquisition) Regulations 2020 ('the CA Regulations') are engaged and, as such, the information prescribed by Regulation 5 of the CA Regulations (namely a supplement to the submitted Book of Reference, a Land Plan identifying the CA Additional Land (which for completeness also shows other additional land required for the Proposed Changes), a Statement of Reasons as to why the CA Additional Land is required and a statement indicating how it is proposed to fund acquisition of the CA Additional Land (an Addendum to the Funding Statement)) is submitted as part of this Proposed Changes Application.

7. An environmental appraisal of each requested change which confirms that there are no new or different significant effects arising from the Proposed Changes compared to those reported within the Environmental Statement submitted with the original application; and
8. A consultation statement describing the non-statutory consultation that has been carried out by the Applicant together with copies of the consultation responses received.

1. INTRODUCTION

1.1. PURPOSE OF THE REPORT

1.1.1. This report has been prepared by the Applicant in respect of the Application for the Proposed Scheme made by the Applicant to the Planning Inspectorate, acting on behalf of the Secretary of State for Business, Energy and Industrial Strategy for a Development Consent Order (DCO) under Section 37(2) of the Planning Act 2008.

1.1.2. The Application was submitted to the Planning Inspectorate on 23 May 2022 and was accepted on 20 June 2022. The consequence of acceptance is that the Proposed Scheme moves forward to examination by the ExA on behalf of the Planning Inspectorate; the Examination is due to commence in Q1 2023.

1.1.3. The Applicant now proposes two minor changes to the Application which are the subject of this report (the 'Proposed Changes'), details of which are provided below:

a. Proposed Change 01 ('PC-01'): The Application submitted to the Planning Inspectorate commits to providing floodplain compensation as part of the Proposed Scheme, but did not confirm where this was to be located. Since the Application was submitted, the Applicant has been able to investigate solutions to the floodplain compensation and has continued to engage with Interested Parties, such as the Environment Agency ('EA'), to confirm a suitable solution (see Section 3.2 of this report). The confirmed solution comprises an area of grazed land to the north of the Existing Drax Power Station Site, within the Applicant's ownership, but not previously included within the Order Limits; and

b. Proposed Change 02 ('PC-02'): Relocation of existing overhead lines in respect of two electrical lines (11kv overhead line crossing the A645 once, owned by Northern Powergrid ('OHL1'), and 11kv overhead line crossing Rawcliffe Road once, owned by Northern Powergrid ('OHL2')) and the Telecommunications line crossing Rawcliffe Road twice, owned by Openreach ('TCL1'), which cross the access route to the Site at A614 (Rawcliffe Road) and the A645, to allow for the delivery of Abnormal Indivisible Loads (AILs) to the Site. This Proposed Change involves land that is outside of the current Order Limits and is not in the ownership of the Applicant.

1.1.4. In the letters of 12 September 2022 and 30 September 2022 (the 'Letters'), the Applicant has previously informed the ExA of its intention to make a Change Request to the Application and suggested how this could be dealt with within the wider Examination process for the Application. The Change Request is now set out in this document, which comprises the Applicant's Proposed Changes Application.

1.1.5. The ExA's response to the Applicant's Change Request letter is provided in letters from the ExA dated 23 September 2022 and 10 October 2022 (the 'ExA's Change Request Letters'). In accordance with the Examining Authority's requests in the ExA's Change Request Letters, this Proposed Changes Application responds fully to the points made in the ExA's letters and is intended to contain sufficient information to enable the Examining Authority to prepare further questions, if necessary.

1.1.6. This report has been prepared with regard to paragraphs 109 to 115 of the Guidance and constitutes Step 4 of the process described in Advice Note 16 for requesting a change to an application being a written change request asking the Examining Authority to examine the changed application (with Steps 1 to 3 already having been completed). It contains the information required by Figure 3 of that Advice Note 16, as follows:

1. A clear description of the proposed changes, including any new/altered works and any new/altered ancillary matters.
2. A statement setting out the rationale and pressing need for making the changes with reference to the Examination Guidance, any relevant National Policy Statement(s) as appropriate and any other important and relevant matters.
3. A full schedule of all application documents and plans listing consequential revisions to each document and plan or a 'no change' annotation, with extracts of the most important documents included within the application.
4. An update of any consents/licences required and whether (given the proposed changes to the application) there will be any impediment to securing the consents/licences before the Examination is concluded.
5. A track changed version of the part of the draft DCO showing relevant changes for each proposed change, and track changed extracts of the draft Explanatory Memorandum.
6. Given that Proposed Change 2 involves land being added to the Order Limits over which it is proposed to exercise powers of compulsory acquisition of rights ('the CA Additional Land') and, to date, consents have not been able to be obtained from all persons with an interest in the CA Additional Land (although discussions are ongoing), the Infrastructure Planning (Compulsory Acquisition) Regulations 2020 ('the CA Regulations') are engaged and, as such, the information prescribed by Regulation 5 of the CA Regulations (namely a supplement to the submitted Book of Reference, a Land Plan identifying the CA Additional Land (which for completeness also shows other additional land required for the Proposed Changes), a Statement of Reasons as to why the CA Additional Land is required and a statement indicating how it is proposed to fund acquisition of the CA Additional Land (an Addendum to the Funding Statement)) is submitted as part of this Proposed Changes Application.

7. An environmental appraisal of each requested change which confirms that there are no new or different significant effects arising from the Proposed Changes compared to those reported within the Environmental Statement submitted with the original application; and
8. A consultation statement describing the non-statutory consultation that has been carried out by the Applicant together with copies of the consultation responses received.

1.2. STRUCTURE OF THE DOCUMENT

1.2.1. **Chapter 2** sets out:

a. the need for the Proposed Changes;
b. a description of the Proposed Changes; and
c. a summary of the environmental appraisal process that has been carried out.

1.2.2. **Chapter 3** sets out:

a. an explanation of the non-statutory consultation that was carried out on the Proposed Changes further to the proposals in the Letters and the comments in the ExA's Change Request Letters, with appendices setting out the consultation material that was produced and the responses received, and a summary of how the Applicant has taken account of the feedback received (with a more detailed appendix at Appendix 8 (document reference 8.5.3.8); and
b. a description of engagement undertaken with stakeholders outside of the formal consultation activities (such as stakeholder meetings and follow up letters and calls with individuals such as affected land interests).

1.2.3. **Chapter 4** sets out:

a. the Applicant's position on the non-materiality of the proposed changes and a summary of its compliance with the CA Regulations; with reference to Advice Note 16 and case law.

1.2.4. **Chapters 5 and 6** provide more detail on each of the proposed changes. The structure of **Chapters 3 and 4** is shown Table 1-1 below.

Table 1-1 - Structure of the Document

Chapter Sub-Heading	Summary of Contents
Need for the Proposed Changes	Explains the reasons why the Proposed Changes are necessary at this stage on the Application process.
Description of Changes Sought	Describes each Change including the use of 'before' and 'after' excerpts from relevant plans/drawings included in the Application, to illustrate how the Proposed Scheme would be

Chapter Sub-Heading	Summary of Contents
	changed if this Change Request is accepted by the Examining Authority. The 'after' sketches indicate how the current versions of those plans / drawings would be amended to give effect to the proposed changes, should the Examining Authority accept the proposed change as part of the Application and therefore for inclusion in the examination of the Application.
Environmental Appraisal	Describes in tabular form the Applicant's review and appraisal of whether any likely significant effects that would be new or materially different from those presented in the ES would arise from the proposed changes
Consequential Amendments to Application documents	Identifies the Application documents that would require amendment should the Change Request be accepted by the Examining Authority. Appended to this Changes Request are track changed extracts of the key Word documents that would be affected by the Change; or extracts of specific sheets from plans/drawing sets that would be affected by the Change, as relevant.

1.3. LEGAL, GUIDANCE AND ADVICE NOTES APPLIED

1.3.1. In bringing forward the Proposed Changes, the Applicant has considered the same legislation and policy considered in the Application.

1.3.2. The Applicant has also considered Advice Note 16 and paragraphs 109 to 115 (Changing an application post acceptance) of the Guidance.

1.3.3. In relation to consultation, the Applicant has considered the benchmark for fairness for changed applications, as set by the case of R (on the application of Holborn Studios Ltd) –v- Hackney LBC [2017] EWHC 2823 (Admin). In this legal case, Judge Howell decided that the question which Hackney LBC should have asked itself, in considering a changed planning application, was *"whether, without re-consultation, any of those who were entitled to be consulted on the application would be deprived of the opportunity to make any representations that they may have wanted to make on the application as amended."*

1.3.4. In the absence of re-consultation on the changed application, Judge Howell held that Hackney LBC had *"deprived the claimants and others of a fair opportunity to make such representations as they might have wanted to make about them and that materially prejudiced the claimants. The procedure followed in the circumstances was so unfair as to be unlawful."*

2. THE PROPOSED CHANGES

2.1. NEED FOR THE CHANGES

PROPOSED CHANGE 01 (PC-01)

2.1.1. PC-01 is required to mitigate against the minor loss of floodplain due to construction of the Proposed Scheme within the Drax Power Station Site.

2.1.2. This change reflects the commitment contained at paragraph 7.1.13 of the submitted Flood Risk Assessment ('FRA') (APP-160) to provide a Floodplain Compensation Area ('FCA') and clarifies the location of the proposed FCA.

2.1.3. Paragraph 7.1.12 and Table 7.2 of the submitted FRA set out the amount of floodplain affected by the existing built footprint compared to the proposed built footprint. Paragraph 7.1.13 concludes that, "*This demonstrates that the Proposed Scheme will result in a minor loss of floodplain, which if not mitigated could have an adverse impact on third parties. This increase will be mitigated by creating additional floodplain (a minimum floodplain area of 1,889m^2 will be created) through the lowering of ground outside the floodplain on land controlled by the Applicant*."

2.1.4. The commitment was made within the submitted FRA to comply with the policy requirements of the Overarching National Policy Statement for Energy ('NPS EN-1') (Department of Energy & Climate Change, 2011); the National Planning Policy Framework ('NPPF') (2021); and the Flood Risk and Coastal Change Planning Practice Guidance ('PPG').

2.1.5. As set out in Paragraph 5.7.5 of the NPS EN-1, the minimum requirements for FRAs include that that they should: "*be proportionate to the risk and appropriate to the scale, nature and location of the project; consider the risk of flooding arising from the project in addition to the risk of flooding to the project; … consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made*…"

2.1.6. Paragraph 5.7.9 of the NPS EN-1 states that the determining authority should be satisfied, where relevant, that *"…in flood risk areas the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed over the lifetime of the development."*

2.1.7. The NPPF encourages decision makers to "*reduce flood risk by making space for water by creating flood flow paths and by identifying, allocating and safeguarding space for flood storage*."

2.1.8. The Flood Risk and Coastal Change PPG states that "*areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain*."

2.1.9. It is considered that PC-01 complies with the above policy and provides a solution for the requirement, identified through the scheme-specific flood risk assessment, to create additional floodplain.

2.1.10. The proposed FCA will only involve land that is owned and under the control of the Applicant and is not considered to comprise a 'proposed provision' for the purposes of the CA Regulations. The land is currently used for grazing purposes by a short-term agricultural tenant who is able to be removed from the land with 28 days' notice.

2.1.11. The works to create the FCA would be temporary in nature and, after the works have been completed and the ground level has been permanently lowered, the ground cover would be reinstated as grassland.

PROPOSED CHANGE 02 (PC-02)

2.1.12. PC-02 is required to facilitate the delivery of AILs to the Site during the construction phase of the Proposed Scheme. The draft DCO submitted with the Application (AS-025) seeks powers to replace or underground overhead power and telecommunications lines at certain locations, which are identified on the Access and Rights of Way Plans (APP-011) (ARoW Plans). These powers are sought because the loads carried as part of the multiple AIL movements would be taller than or interfere with the operation of two electrical lines and the telecommunications line, causing a conflict.

2.1.13. Both the existing Overarching NPS EN-1 and the draft revised EN-1 acknowledge that abnormal loads will be required as part of a scheme; and may cause disruption. Paragraph 5.13.11 and 5.24.12, respectively, say that requirements may be imposed to ensure there are satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.

2.1.14. In that context, PC-02 is being brought forward to ensure that impacts arising from AIL movements (in this case ensuring utility assets are not damaged by them) are able to be dealt with. Such AIL movements are required in the context that paragraph 3.6.2 of Chapter 3 (Consideration of Alternatives) of the ES (APP-039) states that both rail and water were considered for AIL movements and discounted. Further, paragraph 5.2.27 of Chapter 5 (Traffic and Transport) of the ES (APP-041) states that suitable access already exists via the highway network.

2.1.15. The Statements of Common Ground (SoCG) between National Highways and Drax Power Limited (AS-034) and East Riding of Yorkshire (AS-036) show that both parties acknowledge that AIL movements are necessary and will need to be managed pursuant to the measures in the Outline Construction Traffic Management Plan (CTMP) (OD-009).

2.1.16. Section 4.1.5 of Table 4.1 in the SoCG between East Riding of Yorkshire Council (ERoYC) and Drax Power Limited (AS-036) states that ERoYC agree with the Applicant's position with regards to AILs in respect to the selected route and the outline process set out in the CTMP (OD-009). It is stated that discussions will

continue between the parties to ensure the practical implementation of the measures discussed in the CTMP.

2.1.17. The proposed access route for AILs is shown in Figure 5.6 of the ES (APP-067) and is restricted by two existing electrical lines and the telecommunications line which cross the access route to the site at the A614 (Rawcliffe Road) and the A645.

2.1.18. Following submission of the Application, further technical work and ongoing discussions with the owner of the affected Lines (Northern Powergrid and BT Openreach), has identified that the following works may be needed to resolve the conflict between the AIL movements and the Lines:

a. Undergrounding is the preferred approach, but that as a consequence, a slight realignment of the retained Lines and restringing works may also be necessary;
b. Undergrounding needs to take place for the section of the electrical lines which is supported by telegraph poles, i.e. from ‘pole to pole’, rather than just for the section of line which sits over the highway. This requires land outside of the highway boundary;
c. Undergrounding of the electricity and telecommunications lines could be undertaken via horizontal directional drilling (HDD), similar techniques such as thrust boring or auger boring, or open trenching methods, as appropriate for sections of the cable routes; and
d. Third party land outside of Drax's ownership would be required to access the poles and undertake the works. Furthermore, as the position of the electrical cables, be they undergrounded or realigned lines, may be different to the route of the existing lines, DCO land powers will be needed to enable the installation of the altered alignment of the electrical cabling (be they via undergrounded sections or lines), and to access and maintain the altered sections of electrical and telecommunications lines in the future.

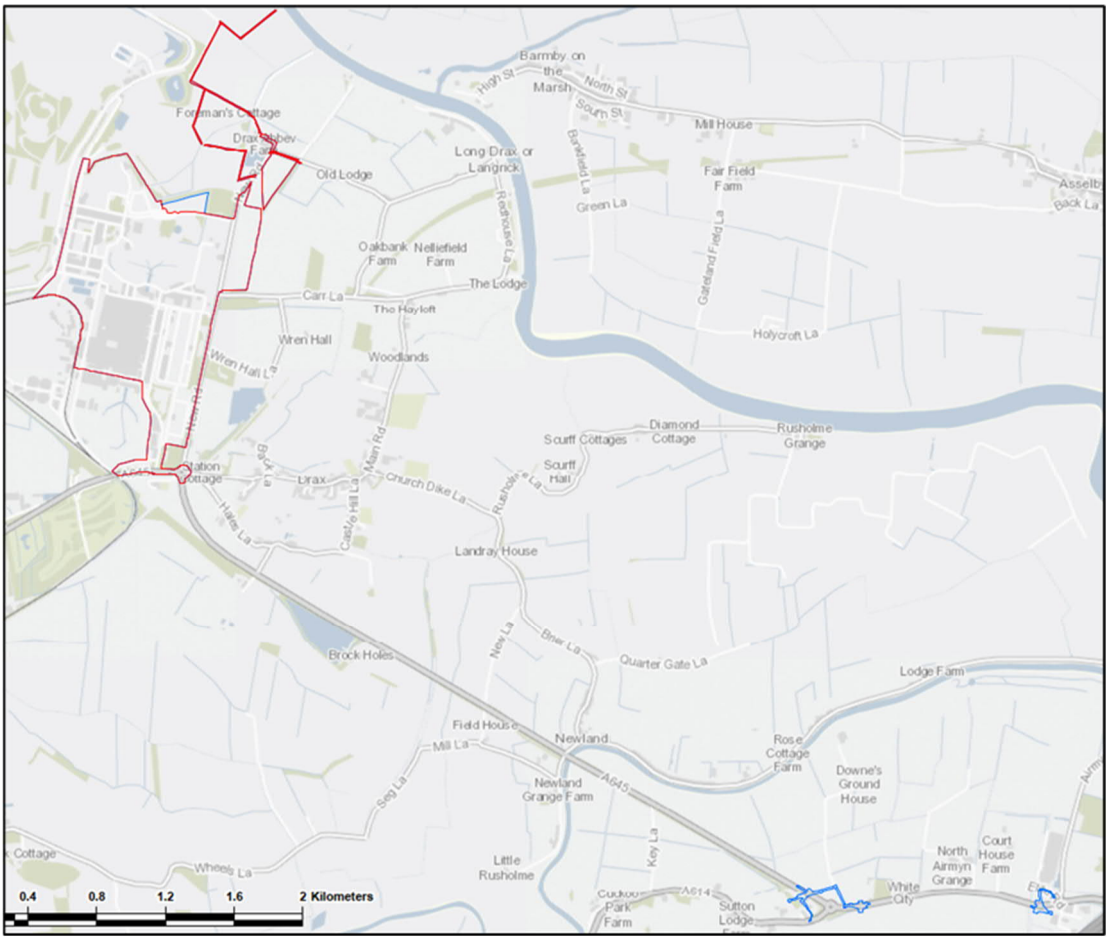
2.1.19. As a result of this Proposed Change, the Applicant is making a ‘proposed provision’ for the CA Additional Land (as defined in the CA Regulations) outside of the current Order Limits.

2.2. SUMMARY OF PROPOSED CHANGES

2.2.1. Plates 2-1, 2-2 and 2-3 identify the additions the Applicant requests to be made to the Order Limits as part of this Proposed Changes Application. The originally submitted Order Limits are outlined in red, and the additional areas of land which provide a proposed addition to the Order Limits are outlined in blue.

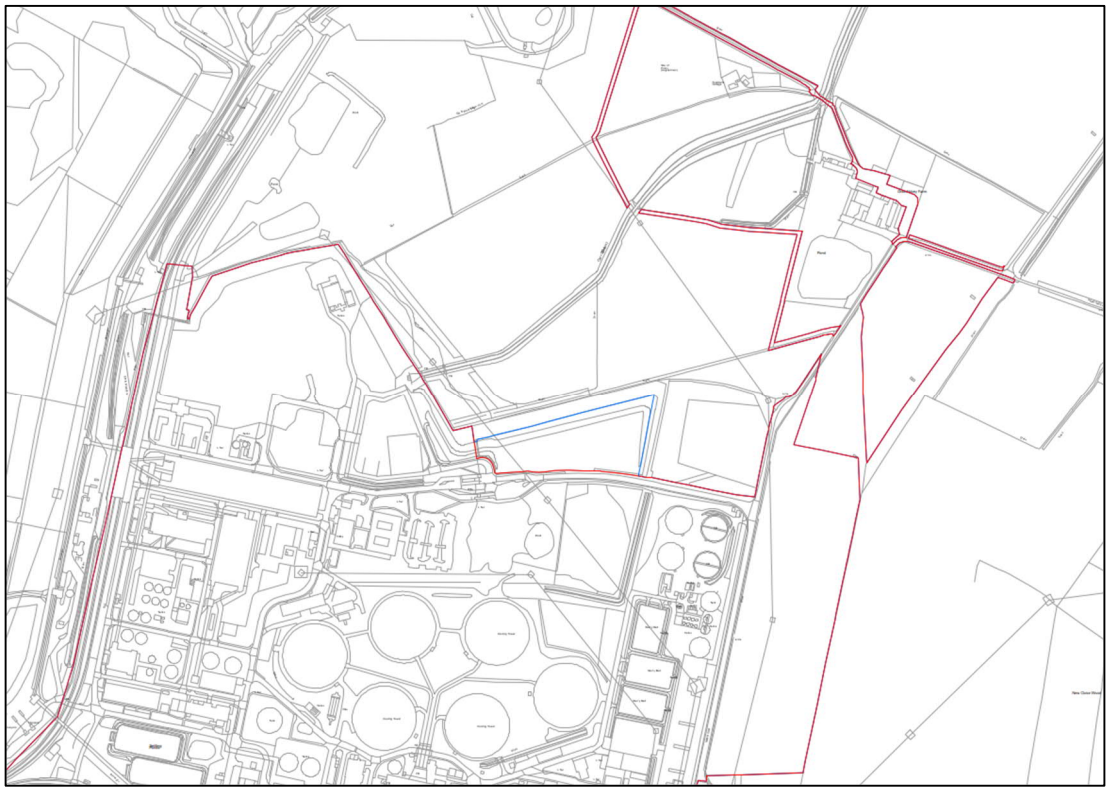
2.2.2. Plate 2-1 identifies the location of the Proposed Changes in the context of the Drax Power Station Site and the part of the AIL route between the M62 and the Site.

Plate 2-1 - Wider Context of the Proposed Changes to Order Limits



2.2.3. The land required for PC-01, to provide the FCA, is shown in more detail in Plate 2-2, and is located immediately to the north of the Drax Power Station Site boundary fence and comprises a field with undulating topography, but with a general sloping gradient from higher ground levels towards the southern edge of the field and lower levels to the north.

Plate 2-2 - Proposed Changes to Order Limits (PC-01 – FCA)



2.2.4. The land required for PC-02, to enable necessary works to existing lines oversailing the proposed route for AILs, is shown in more detail in Plate 2-3, and comprises two areas of land along the A645/A614 part of the AIL route, the closer of which is approximately 4 km (2.5 miles) to the southeast of the Drax Power Station Site.

Plate 2-3 - Proposed Changes to Order Limits (PC-02 – Overhead Lines)

2.2.5. Plates 2-4 and 2-5 show relevant extracts of the previous (Plate 2-4) and revised (Plate 2-5) Works Plans illustrating the Proposed Changes. Extracts of changes to Works Plans arising from the Proposed Changes are provided at Appendix 10, document reference 8.5.3.10.

Plate 2-4 – Works Plans Key Plan for DCO Application

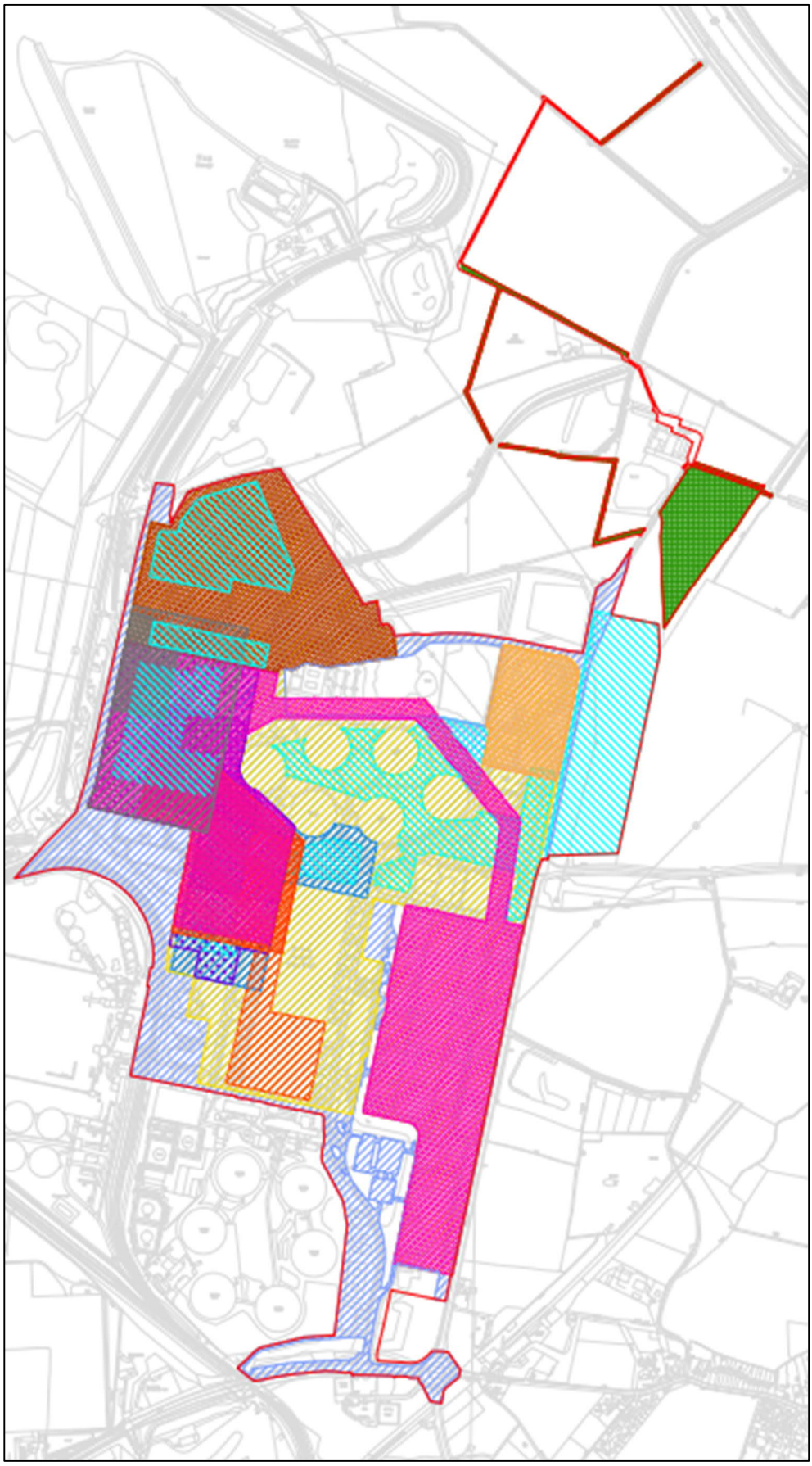
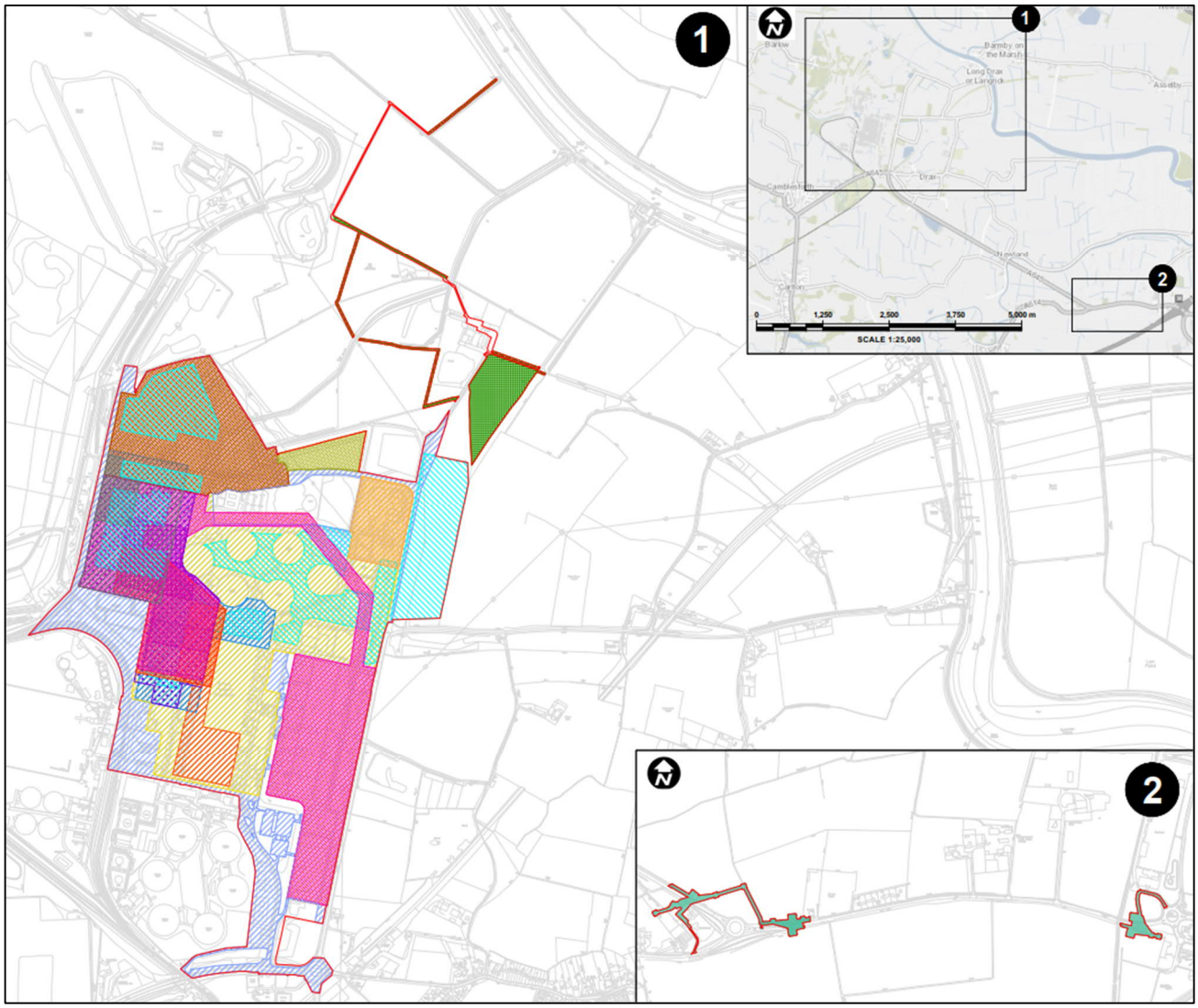


Plate 2-5 – Works Plans including the Proposed Changes



PROPOSED CHANGE 01 (PC-01)

2.2.6. The PC-01 is proposed to provide replacement floodplain capacity in the form of an FCA. This Change reflects the previous commitment in the submitted Application documents to provide the FCA, as set out in Paragraph 2.1.2 of this report, and clarifies the location of the proposed FCA. A more detailed description of PC-01 and relevant assumptions are set out at in Section 5.1 of this report.

2.2.7. PC-01 only involves land that is owned and under the control of the Applicant.

PROPOSED CHANGE 02 (PC-02)

2.2.8. The PC-02 is proposed to carry out works to divert existing overhead lines in respect of two electrical lines (OHL1 and OHL2) and the telecommunications line (TCL1) which cross the access route to the site at A614 (Rawcliffe Road) and the A645, to allow for the delivery of AILs to the Site. This Proposed Change involves land that is outside of the current Order Limits and is not in the Applicant's ownership. A more

detailed description of PC-02 and relevant assumptions are set out at in Section 6.1 of this report.

2.2.9. Third party land would be added to the Order Limits to be subject to the works powers to undertake the necessary works, as well as powers of compulsory acquisition of rights to facilitate long-term access and maintenance to the diverted assets.

2.3. ENVIRONMENTAL APPRAISAL OF THE PROPOSED CHANGES

2.3.1. The potential implications of the Proposed Changes have been considered to identify if they would result in any new or different likely significant environmental effects compared to the environmental impact assessment (EIA), that was reported in the technical chapters of the Proposed Scheme's Environmental Statement (ES).

2.3.2. In assessing the Proposed Changes, the Applicant has considered whether, or to what extent, the change might alter the description of the relevant element of the development within the ES, in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations') which sets out how an EIA should describe a proposed development.

2.3.3. In addition, the Applicant has considered:

a. The degree of change in the context of the Proposed Scheme as a whole (i.e. whether it is significant or not);
b. The effect of the change in environmental terms (i.e. whether it would result in a change to the findings of the assessment carried out in respect of the Proposed Scheme prior to submission of the Application);
c. The effect of the change on the local community; and
d. The likely level of public interest in the change (i.e. whether there would be interest or concern about the change, taking account of engagement carried out to date).

2.3.4. Within the Ecology section of the appraisal tables, consideration has also been given as to whether the changes would result in updates being required to the Habitats Regulations Assessment documentation submitted with the Application, or whether a new EPS licence would be required because of the Proposed Changes.

2.3.5. The environmental appraisals for each of the Proposed Changes are provided in Chapters 5 and 6 of this report. Overall, it is not anticipated that there will be any new or different significant effects when treated alone, when considered as part of the Proposed Scheme, or cumulatively with other plans and projects as a result of the Proposed Changes.

2.3.6. The Applicant has also considered where the Proposed Changes would affect the other consents that the Applicant may be required to obtain outside of the DCO process. It is considered that the Proposed Changes would not constitute an impediment to the grant of any other consents and licences required outside of the DCO process, and no additional consents or licences would be required.

3. CONSULTATION AND ENGAGEMENT

3.1. NON-STATUTORY CONSULTATION ON THE PROPOSED CHANGES

3.1.1. The Applicant held a non-statutory consultation on both of the Proposed Changes.

3.1.2. The consultation ran from 21 October 2022 to 20 November 2022. The Applicant advised that all consultation responses must be received no later than 23:59 on 20 November 2022.

3.1.3. Table 3-1 sets out the methods the Applicant used to promote the consultation and communicate with consultees.

Table 3-1 - Consultation Promotion and Communication Methods

Method	Detail	Further Information
Letter for land interests	Letter enclosing notice, booklet and plans posted to everyone with a land interest in the areas covered by both of the Proposed Changes.	Copy of letter provided in Appendix 6
Letter for statutory and non-statutory consultees	Letter enclosing notice and linking to online copy of booklet and plans posted to all statutory and non-statutory consultees. This included 73 homes or businesses within the consultation zone, in the vicinity of the Proposed Changes. This zone is shown in Appendix 6.	Copy of letter provided in Appendix 6. List of statutory and non-statutory consultees provided in Appendix 7. This list reflects the approach taken with the Application; for example, statutory bodies are as per Consultation Report Appendix D (APP-022). The Applicant took an inclusive approach to this consultation, with the statutory undertakers excluded in that Appendix D written to for the purposes of this consultation. However, the Applicant did not consult Homes England, as it was felt that the changes did not affect their functions.

Method	Detail	Further Information
Site notices	Site notices were displayed around each of the locations and checked weekly.	Copies of site notices and photographs of site notices in situ, and a map of the locations where they were placed, is provided in Appendix 6.
Website	A page on the Drax BECCS consultation website set out the changes, including booklet and plans.	Copy of website consultation page provided in Appendix 6.
Brochure	A brochure was available for download from the consultation website and sent to everyone with a land interest.	Copy of brochure provided in Appendix 6.
Press notices	Notices were placed in the following four local newspapers for two consecutive weeks: • Epworth Times (13/10/2022 and 20/10/2022) • Goole Times (13/10/2022 and 20/10/2022) • Pontefract and Castleford Express (13/10/2022 and 20/10/2022) • Selby Times (13/10/2022 and 20/10/2022)	Copies of notices provided in Appendix 6.
Deposit points	Copies of the Proposed Changes Consultation Booklet along with a poster promoting the consultation were made available for inspection free of charge in three libraries: • Selby Library • Snaith Library • Goole Library	Photographs of deposit points provided in Appendix 6.

Method	Detail	Further Information
	The addresses and opening times of the libraries were included in the public notices and site notices. All three libraries were checked weekly to ensure sufficient brochures and posters were in place.	
Poster	Posters promoting the consultation were printed and displayed in libraries acting as deposit points.	Copy of poster provided in Appendix 6.

3.1.4. Table 3-2 sets out who the Applicant consulted.

Table 3-2 - Stakeholders Consulted by the Applicant

Consultee	Detail	Further Information
Everyone with a land interest in the areas covered by the two Proposed Changes	All Category 1-3 parties with an interest in the relevant plots.	List of those consulted due to a land interest provided in Appendix 7.
Statutory and non-statutory consultees	Organisations identified as statutory or non-statutory consultees. This included 73 homes of businesses within the consultation zone, in the vicinity of the	List of statutory and non-statutory consultees provided in Appendix 7.

Consultee	Detail	Further Information
	Proposed Changes. This zone is shown in Appendix 6.	
General public	A page on the Drax BECCS consultation website set out the scheme and how to respond. Site notices erected at the locations of the Proposed Changes also set out this information. Posters and brochures at deposit points allowed members of the public to find out more about the scheme.	Copy of website consultation page provided in Appendix 6. Copies of site notices and photographs of site notices in situ provided in Appendix 6. Copies of the poster and brochure provided in Appendix 6.

3.1.5. Consultees were able to respond to the consultation by:

a. Email (info@BECCS-Drax.com)
b. Post (FREEPOST CARBON CAPTURE BY DRAX)
c. Phone (01757 618381)

3.1.6. During the consultation period, the Applicant monitored responses. Action was taken in relation to requests for additional information or where an alternative contact method (for example, a different email address) was provided.

3.1.7. For example, one consultee requested we communicate via a different email address, and another consultee requested shape files for the proposals. Both requests were promptly actioned.

3.1.8. On 26 October 2022, the Project page of the PINS website[1] published information which included the Proposed Changes Application Consultation.

3.1.9. The relevant wording within the PINS website notification is as follows:

"Following the Applicant's initial notification of proposed scheme changes[2] (PDF, 1 MB), the ExA's initial response[3] (PDF, 256 KB), and subsequent correspondence from the Applicant[4] (PDF, 128 KB) and the ExA[5] (PDF, 170 KB), the Applicant is undertaking consultation on its proposed changes until 23:59 on 20 November 2022.

"If you wish to respond to this consultation, please contact the Applicant directly by post at: FREEPOST CARBON CAPTURE BY DRAX, or by email at: info@BECCS-Drax.com. You may also contact the Applicant for further information about this consultation by telephone at: 01757 618381."

3.2. ENGAGEMENT ACTIVITIES

3.2.1. As noted in Appendix 5 (Flood Risk Assessment Extracts) (document reference 8.5.3.5), the details of PC-01 have been discussed in technical meetings with the Environment Agency, who have indicated their acceptance in principle of the change.

3.2.2. In respect of change PC-02, the Applicant has been undertaking on-going liaison with the asset owners of the OHLs affected, pursuant to the NRSWA 1991 C2-C4 process. These discussions will continue on into detailed design.

3.2.3. The Applicant is seeking to acquire new permanent rights and temporary use of land for the works outlined in the Change Request Application. No land will be acquired permanently. The Applicant is actively engaging with the landowners affected by the works associated with PC-01 and PC-02 with a view to acquiring the necessary rights and temporary use of land by agreement. These negotiations are ongoing.

3.2.4. The Applicant has undertaken diligent inquiry to identify all relevant land interests of land identified in Table 2-1. The diligent inquiry process undertaken by the Applicant is set out in the Statement of Reasons (Appendix 14 (document reference 8.5.3.14) Section 4.1.2.

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[1] https://infrastructure.planninginspectorate.gov.uk/projects/yorkshire-and-the-humber/drax-bioenergy-with-carbon-capture-and-storage-project/
[2] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010120/EN010120-000581-EN010120_Drax_BECCS_Letter_from_Applicant_dated_12_Sept_22.pdf
[3] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010120/EN010120-000586-20220923_EN010120_Drax_BECCS_Response_to_Applicants_Letter_of_12_Sept_22.pdf
[4] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010120/EN010120-000594-8.2.3_Drax_BECCS_Cover_Letter_300922_Redacted.pdf
[5] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010120/EN010120-000601-20221010_EN010120_Drax_BECCS_Response_to_Applicants_Letter.pdf

3.2.5. Following completion of the above inquiry process, the Applicant's Land Agent is progressing discussions with landowners and tenants. These discussions are ongoing, and are not yet complete. A summary of engagement with landowners and tenants undertaken to date is attached at Annex 1 to Appendix 14: Statement of Reasons – Addendum in relation to the Proposed Changes (document reference 8.5.3.14).

3.2.6. The exercise has also led to two parties giving their consent to the inclusion of the proposed provision of the CA Additional Land:

a. Harry Dickinson, in respect of plot 01-93; and
b. Roger John Vincent Pickering in respect of plots 01-96, 01-97, 01-100 and 01-118.

3.2.7. These consent forms are appended to Annex 1. However, as there are other interests in these plots who have not yet issued consent to the inclusion of these plots, it is necessary for the plots to still form part of the Applicant's proposed provision.

3.3. SUMMARY OF RESPONSES RECEIVED AND APPLICANT RESPONSE

3.3.1. The Applicant received 19 responses to the consultation.

3.3.2. Table 3-3 summarises the number of each type of response received by the Applicant.

Table 3-3 – Total Consultation Responses Received by the Applicant

Total responses received	**19**
Responses offering no comment or no objection	8
Responses asking for additional information, which was provided, and offering no further response	5
Responses giving the Applicant information	4
Responses objecting to either of the Proposed Changes	2
Responses proposing amendments to either of the Proposed Changes	0

3.3.3. All Consultee comments have been properly considered. Comments requiring a response have been received from:

a. East Riding of Yorkshire Council
b. Humberside Fire Authority
c. JBA Consulting (on behalf of Goole and Airmyn IDB)
d. Natural England

e. AOL

f. JRS Services (Leeds) Limited

3.3.4. The Applicant's responses to these comments, are set out in full in Appendix 8 (document reference 8.5.3.8). The Applicant will continue to engage with interested parties.

4. NON-MATERIAL NATURE OF THE CHANGE REQUESTS AND COMPLIANCE WITH THE CA REGULATIONS

4.1.1. As set out in the Planning Inspectorate's Advice Note 16 ('Requesting Changes: How to request a change which may be material') the determination of whether the changes requested are material is to be made by the ExA, not the Applicant.

4.1.2. In the absence of any definition in relevant legislation of the terms 'material' and 'non-material', the Applicant has had regard to the characteristics that indicate that a change may be more likely to be regarded as a material change; examples of which are considered in Advice Note 16 and in paragraphs 109 to 115 of the 'Guidance for the examination of applications for development consent' examination guidance issued in March 2015 to provide a starting point for assessing the materiality of a change.

4.1.3. The Applicant has reviewed the proposed changes in the context of the environmental impact assessment ('EIA') carried out in respect of the Proposed Scheme, the findings of which are reported in the Environmental Statement ('ES').

4.1.4. The review has considered whether the proposed changes would give rise to any new or materially different likely significant effects. In assessing the proposed changes, the Applicant has considered whether, or to what extent, the proposed change might alter the description of the relevant element of the development within the ES, provided in compliance with paragraph 17 of Part 1 of Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 ('the 2009 EIA Regulations'), which sets out how an ES should describe a proposed development for the purposes of environmental impact assessment:

a. *"Description of the development, including in particular—*
    i. *"(a) a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;*
    ii. *"(b) a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;*
    iii. *"(c) an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc) resulting from the operation of the proposed development."*

4.1.5. In addition, the Applicant has considered:

a. the degree of change in the context of the Proposed Scheme as a whole (i.e. whether it is significant or minor);
b. the effect of the change in environmental terms (i.e. whether it would result in a change to the findings of the assessment carried out in respect of the Proposed Scheme prior to submission of the Application);
c. the effect of the change on the local community (i.e. what effect, if any, it would have on the local community); and

d. the likely level of public interest in the change (i.e. whether there would be interest or concern about the change, taking account of engagement carried out to date).

4.1.6. The results of this review are documented in Chapter 5 and Chapter 6 of this report. The proposed changes have not been found to result in any new or materially different likely significant environmental effects.

4.1.7. The changes are considered to be:

a. localised in nature; being, for PC-01, a small amount of works on land located adjacent to Drax's operations and owned by it; and which would be unlikely to be differentiated from the wider Proposed Scheme or operation of the Existing Drax Power Station; and for PC-02, involving a short and small amount of highways and utility works;

b. limited in their effects given no new or materially different likely significant environmental effects are caused and that impacts such as traffic will be able to be managed in line with standard traffic management measures; and

c. do not change the substance of the Proposed Scheme for which development consent is sought.

4.1.8. The Applicant also notes that the requirement for the CA Additional Land can affect the materiality of a change. However, whilst it is acknowledged that PC-02 involves the proposed provision of the CA Additional Land, this is limited in spatial extent and relates to the imposition of rights for the benefit of utility companies who already held rights or had apparatus located on the same land. It is therefore essentially a 'like for like' replacement of those rights, just over a slightly adjusted area. It is also noted that some of the parties affected have already consented to the change.

4.1.9. The Applicant has therefore concluded that they are not material in nature.

4.1.10. PC-01 requires changes to the Order Limits set out in the Application to include land for the FCA. This additional land is under the Applicant's ownership; and as such no land powers are proposed over it, as shown on the Land Plans and Works Plans submitted with the Application. The changes to the Order limits are therefore not subject to the CA Regulations, notwithstanding the existence of third-party interests over that land.

4.1.11. The Applicant considers that the CA Regulations apply only to the proposed additional land for PC-02 (overhead lines).

4.1.12. The information prescribed by Regulation 5 of the CA Regulations has been provided with this change request in relation to the additional land. This is also identified in Figure 3 (5) of Advice Note 16. The information provided includes an updated Book of Reference (shown as a clean version (Appendix 17 (document reference 8.5.3.17)) and a version with tracked changes (Appendix 16 (document reference 8.5.3.16)); updated Land Plans (Appendix 9 (document reference 8.5.3.9)) to identify the additional land for the Change Request; an addendum to the Statement of Reasons (Appendix 14 (document reference 8.5.3.14); and an addendum to the submitted Funding Statement (Appendix 15 (document reference 8.5.3.14).

4.1.13. As noted in Section 3, whilst three parties have given their consent to the inclusion of the additional land to the Order Limits, there are no plots where all parties to those plots have given such consent. As such, all new compulsory acquisition of rights plots shown in those documents form part of the Applicant's proposed provision of additional land.

4.1.14. The Book of Reference and Land Plans include updates relating to both PC-01 and PC-02 so that they can be understood together. However, in the Book of Reference, the changes relating to PC-01 are in blue coloured text, and for PC-02 are in green coloured text in relation to the CA Additional Land, and in red for the temporary possession plots, so that the 'proposed provision' can be understood in its own right.

4.1.15. For the avoidance of doubt, whilst these documents include information on land that is required for both temporary possession only; as well as land over which powers of compulsory acquisition of rights and easements are sought, it is considered that it is only the latter plots that should be considered to form part of the 'proposed provision' of additional land for PC-02, for the purposes of the CA Regulations. This is on the following basis:

4.1.16. The CA Regulations as is explained in its accompanying Explanatory Memorandum, sets out the procedures to be followed where it is proposed to include in an order granting development consent a provision authorising the compulsory acquisition of land, which was not included in the application for the order.

4.1.17. Regulation 4 of the CA Regs Regulations confirms that regulations 5 to 19 of the CA Regulations apply where it is proposed to include in an order granting development consent a provision authorising the compulsory acquisition of land and a person with an interest in the additional land does not consent to the inclusion of the provision.

4.1.18. A provision authorising the temporary possession of land is not a provision that authorises the compulsory acquisition of land, an interest in land or rights over land.

4.1.19. Temporary possession is fundamentally different in character from the compulsory acquisition of land, or of rights over land, because a temporary possession does not in any way affect the title to that land. A temporary possession provision temporarily dispossess the occupant of the land and suspends the exercise of any rights enjoyed over that land for the duration of the period of temporary possession. During this period the owner would remain free to deal with the title in any way it sees fit, subject to the temporary possession. Once the temporary possession ceases the land may be re-occupied and any person enjoying rights over it would be able to resume doing so. At no point would the undertaker "acquire" the land or an interest in the land or any right over it.

4.1.20. This distinction is maintained throughout Regulations 5 to 19 of the CA Regulations which use the term "proposed provision" to refer to the provision that must be considered in accordance with the procedures set out in those regulations. Regulation 2 (Interpretation) explains that (emphasis added): "proposed provision" means a compulsory acquisition request in respect of additional land; and: "compulsory

acquisition request" means a request for an order granting development consent to authorise compulsory acquisition of land or of an interest in or right over land.

4.1.21. Because a temporary possession provision would not authorise the compulsory acquisition of land or of an interest in or right over land it is not a "proposed provision" and so the procedures in the CA Regulations would not apply to temporary possession plots.

4.1.22. This approach would be consistent with the precedent set by the examination of the A14 Cambridge to Huntington Improvement Scheme Order 2016. During the course of that examination that applicant applied for a series of non-material changes which included the addition of further land within the Order limits and which variously included compulsory acquisition of land, of rights over land and of temporary possession of land. In the case of changes that required the compulsory acquisition of additional land, or rights over additional land, the Examining Authority either (i) followed the procedures in the CA Regulations or (ii) accepted the changes without having followed the procedures in the CA Regulations on the basis that all persons with interests in the land consented to the inclusion of the proposed provision in accordance with regulation 4 of the CA Regs. Consistent with the view that temporary possession is not compulsory acquisition, the Examining Authority did not require the applicant to obtain the consent of all persons with interests in the land, or follow the procedures in the CA Regs. This approach can be seen for example, in paragraph 2.3 of its procedural decision of 22 October 2015 [PD-018]; "The change DR1.103 does not require compulsory acquisition, as it is for temporary possession; therefore, no additional consents are required from landowners."

5. PROPOSED CHANGE 01

5.1. DESCRIPTION OF THE CHANGE

5.1.1. PC-01 is proposed to provide replacement floodplain capacity in the form of an FCA. This change reflects the previous commitment in the submitted Application documents to provide the FCA and clarifies the location of the proposed FCA. It will only involve land that is owned and under the control of the Applicant.

5.1.2. The land on which the FCA is proposed to be located is adjacent to the north of the existing Order Limits. This is shown on Plates 2-2 and 2-3, and on the updated Land Plans (Appendix 9 (document reference 8.5.3.)9) and Work Plans (Appendix 10 (document reference 8.5.3.10)) submitted with this Proposed Changes Application to illustrate the implications of the Proposed Changes. Plates 2-4 and 2-5 show relevant extracts of the previous (Plate 2-4) and revised (Plate 2-5) Works Plans illustrating the Proposed Changes

5.1.3. The FCA Landscape and Biodiversity Plan (see Figure 3 (document reference 8.5.2.3) illustrates the habitat creation proposals for the FCA and highlights features which will be retained.

PROPOSED METHODOLOGY AND ASSUMPTIONS

5.1.4. To deliver the FCA, works will include the following summary activities:

a. fencing off area of proposed works to ensure works do not impact existing mature vegetation that is to be retained in areas outside the proposed additional land identified for PC-01;
b. excavating material to 1:4 side slope requirements for reprofiled contours to provide the required FCA;
c. reprofiling of the site; and
d. using excavated material to landscape the site.

5.1.5. Further assumptions are set out below:

a. The works will involve excavation of 2,505 m^3 of soil/grassland material to support flood compensation, resulting in temporary loss of grassland;
b. On completion of excavation, the excavated area will be seeded with neutral grassland species mix;
c. Excavated arisings will be placed onto central area of the FCA resulting in additional temporary loss of grassland. Arisings will be seeded with neutral grassland species mix;
d. Remaining grassland area within the FCA not included as part of the FCA works are to be seeded with neutral grassland species mix;
e. No trees or hedgerow habitats will be removed as part of the FCA works;
f. All works are outside of any Root Protection Area (RPA), given that they are above the base of the trees;

g. Opportunities for tree and shrub planting to enhance visual amenity (screening), and to enhance both landscape and ecological connectivity will be investigated;
h. Efforts will be made to ensure the proposed planting scheme will be designed to enhance landscape integration; and
i. Where possible, the spoil will be deposited to create naturalistic contours that integrate the proposed FCA and spoil earthworks with the existing landscape and surrounding topography.

5.1.6. The extract from the updated Flood Risk Assessment also provides more information on the proposed works, as set out in Appendix 5 (document reference 8.5.3.5).

5.1.7. On the basis of the above, it is considered that seeding of all sections of the FCA will provide reinstatement and enhancement of temporarily lost grassland habitat; and that the seeding of the remainder of the field (i.e. the area not impacted by FCA works) provides additional habitat gains.

5.1.8. Details of the above (and likely management / maintenance prescriptions) are set out in Figure 3 (FCA Landscape and Biodiversity Plan) (document reference 8.5.2.3) and would be provided in an updated version of the Outline Landscape and Biodiversity Strategy (OLBS) (APP-180 – APP-183) for the Examination if PC-01 is accepted into Examination.

5.1.9. Further detail on water-related assumptions is provided below (please refer to Appendix 5 (document reference 8.5.3.5)):

a. The FCA will be kept and maintained in perpetuity (which will be secured by the DCO Requirement which secures the FRA);
b. Flood waters can access the site naturally by flowing through the tree line along the northern boundary of the field, and will recede in the same manner;
c. No contamination / other issues which would prevent use of the land (please refer to Appendices 1, 2 and 3, (document references 8.5.3.1, 8.5.3.2 and 8.5.3.3 respectively));
d. No changes in the flood model / climate change allowances compared to those submitted in the ES;
e. The site is not at risk of flooding in the present-day scenario, thus the FCA provision isn't a pre-commencement requirement; and
f. The excavated material will be located in an area of the FCA which is bounded by existing higher ground, therefore it is located outside of the existing floodplain and the addition of material on top will have no impact on the risk of flooding during the design event in the area or elsewhere.

5.1.10. It is proposed that all works to provide the FCA will be contained within the Floodplain Compensation Area within the addition to the Order Limits proposed by PC-01. The FCA will be accessed via the Drax Power Station Materials Handling Gatehouse Access via New Road, and then via the internal Drax Power Station access road to the track providing access to the south-west corner of the field via an existing field gate. There are no changes proposed to the Access and Rights of Way Plans arising

from PC-01. As these existing access points to and within the Drax Power Station Site are already contained within the Order Limits of the submitted Application.

5.2. SUMMARY OF THE ENVIRONMENTAL APPRAISAL

5.2.1. The potential implications of PC-01 on flood risk during construction and operation stages have been considered. The purpose was to identify if the changes would result in any new or different likely significant environmental effects compared to those recorded in the technical chapters of the ES. Environmental impacts during decommissioning have not been considered as it is anticipated that the proposed FCA would remain in situ in perpetuity.

5.2.2. PC-01 is the creation of additional floodplain which was identified as being required in order to mitigate the loss of floodplain associated with the Proposed Scheme as detailed in the Flood Risk Assessment (APP-160) and Chapter 12 (Water Environment) of the ES (APP-048). These works would take place on land owned by the Applicant outside of the current DCO Order Limits.

5.2.3. Table 5.1 below presents the outcome of the environmental appraisal of PC-01.

Table 5-1 –Environmental Appraisal for PC-01

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 5: Transport	The proposed FCA does not result in a change to the findings of the original traffic and transport assessment contained in **Chapter 5 (Traffic and Transport) (APP-041)** in the ES. During the construction phase vehicular access to the FCA would be from the existing Material Handling Access formed with New Road and subsequently the internal roads within the Drax Power Station Site. No physical changes to the public highway are required to facilitate vehicular access to the FCA. Vehicle movements (light duty vehicles (LDV) and heavy duty vehicles (HDV)) impacts during the construction phase would remain within the levels assessed in the ES by programming the works outside the peak Proposed Scheme construction periods (to be secured through the Outline Construction Traffic Management Plan (OD-009)) and retaining the cut material within the FCA. It is anticipated that any change in vehicle movements on the wider highway network and in off peak periods would be no more than six LDV (12 2-way trips) per day during the construction works. In addition, no more than five HDV (10 2-way trips) may be required to transport plant and equipment to and from site at the start and end of the works, with occasional HDV trips during construction if additional plant or equipment is required. It is considered that the change in vehicle movements is negligible and would remain within the levels assessed in the ES. A Public Right of Way (PRoW) reference 35.47/6/1 runs east to west approximately 25m to the north of the FCA Order Limits. It is therefore not anticipated that there would be any temporary impacts, such as diversions or closures, to the PRoW. PC-01 would not change the significance of effects of severance, pedestrian amenity, fear and intimidation, highway safety, and driver delay during the construction phase in the ES from that originally assessed. It is considered that the change in vehicle movements is negligible and would remain within the levels assessed in the ES as outlined earlier.	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	During the operational phase the FCA works would result in no change in vehicle movements as assessed in the ES (as the FCA would be left in situ) and no permanent effects on the PRoW network.	
Chapter 6: Air Quality	Works associated with the FCA solution have the potential to generate fugitive dust emissions during the construction phase. However, given that there will be no high sensitivity receptors within 350 m of the FCA Order Limits, (as defined by Institute of Air Quality Management guidance), there would be no change to the findings of the ES. The construction dust mitigation measures set out in the ES and Register of Environmental Actions and Commitments (REAC) (AS-027), which would be implemented via a CEMP remain appropriate. All excavated material (details of which are set out in the Ground Conditions section of this table) would be reused within the FCA Order Limits and would not need to be transported off site. There would be no change to impacts associated with on-road construction vehicle emissions on local air quality. Whilst some non-road mobile machinery would be required to excavate and move material within the site, emissions from these would be intermittent and short-term and, given the absence of high sensitivity receptors within 350 m of the FCA Order Limits, there would be no change to impacts on local air quality. Given these works would take place entirely during the construction phase, there would be no change to the air quality impacts assessed for the operation phase.	The change would not result in any new or different significant effects from those described in the ES.
Chapter 7: Noise and Vibration	The nearest noise sensitive receptor is Drax Abbey Farm (R14 in Figure 7.1 (Baseline Noise Survey and Sensitive Receptor Locations) (APP-089) of the ES), approximately 400m north east of the FCA. Noise levels due to earthworks at Drax Abbey Farm would not exceed the Significant Observed Adverse Effect Level (SOAEL), provided that noise levels at 10m from the earthworks activities do not exceed 85dB(A) at 10m, as presented in Appendix 7.1 (Construction Noise and Vibration Assumptions) (APP-130) of the ES, and this will be implemented via a CEMP as secured	The change would not result in any new or different significant

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	by the REAC (AS-027) and DCO. Vibration levels at the nearest receptors due to the works are not expected to exceed the SOAEL. Peak Particle Velocity (PPV) levels due to earth compaction at this distance are unlikely to exceed 0.1mm/s. The SOAEL has been defined in Chapter 7 (Noise and Vibration) (APP-043) as 1mm/s. Therefore, the SOAEL would not be reached. It is therefore anticipated that there would be no new or different significant effects during construction. It is also anticipated that there would be no potential noise and vibration impacts during operation as the FCA would be left in situ.	effects from those described in the ES.
Chapter 8: Ecology	The FCA is set within a parcel of species-poor semi-improved grassland which is used for sheep grazing. The grassland parcel varies in its topography, sloping down from north to south / east. The grassland is bordered to the north by a managed broadleaved woodland belt which connects into North Station Wood (a broadleaved woodland block) to the east. It is bordered to the south by a hedgerow with intermittent broadleaved trees. Scrub, rank grassland and the wider Drax Power Station is located to the west of the FCA. Currently, most of the existing grassland has low botanical diversity, with limited suitability to support important ecological features. The bordering habitat interfaces, such as woodland edges and hedgerow fringes, provide a limited extent of suitable habitat for reptiles (although previous surveys of the Drax Power Station Site in 2018 recorded no reptiles). These habitats also provide potential terrestrial habitat for great crested newt, although are located more than 250 m from any ponds with recorded GCN presence. The grassland also provides potential suitability for badgers, primarily for foraging. Notwithstanding its suitability for the above ecological receptors, no additional protected and notable species were identified during ecological surveys and assessments of this area which were undertaken in 2021, with an updated walkover survey completed on the 23 November 2022 (see Appendix 4 (Ecology Survey Technical Note) (document reference 8.5.3.4)). Moreover, the FCA does not support habitat or features that would be suitable for new or additional European Protected Species beyond those assessed in Chapter 8	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	(Ecology) (APP-044) of the ES and as a result would not trigger the requirement for a European Protected Species Development Licence. Given the surrounding tree cover and topography (lack of unobstructed sightlines) and the location inside the operational Drax Power Station adjacent to one of the main site access points, the grassland is not suitable to provide functionally-linked habitat for birds or other species associated with nearby statutory designated sites. The FCA works comprise excavation of an area of approximately 3369 m^2 in the north of the grassland parcel, meaning no bordering habitats such as woodland, scattered trees, hedgerows or other Habitats of Principal Importance (HPI) would be removed or modified. The FCA is not in proximity to any statutory or non-statutory designated site, nor are there impact pathways connecting the FCA with such protected sites that could give rise to a likely significant effect. As a result, the conclusion presented in the Habitats Regulations Assessment (HRA) (APP-185) remains unchanged. Excavation and vehicular movement as part of the FCA could cause intermittent disturbance to breeding birds in the wider woodland habitats, but the works would be short-term (approximately four weeks) and similar in nature (including noise levels) to agricultural machinery used in the wider landscape, which breeding birds are likely to be habituated to. Furthermore, site clearance is to take place outside of the breeding bird season (where practicable), or with controls in place to minimise impacts as outlined in Ref ID E5 in the REAC (AS-027), which would equally apply to the FCA works. The REAC contains the mitigation to be secured by requirements in the DCO and would include a requirement for a CEMP to be produced for the Proposed Scheme. These measures would greatly reduce any potential disturbance to the nesting success of breeding birds in the area. As part of the works, the excavated material is to remain within this grassland and be suitably sited. This relocated material would form part of habitat creation and enhancement proposals in this area, in the form of an enhanced grassland bund. Upon completion of the works, the FCA would then be reinstated as grassland. These measures would be added to the Outline Landscape and Biodiversity Strategy (OLBS) (APP-180) which would be updated and submitted into the	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	Examination of the Proposed Scheme should PC-01 be accepted. The measures would then support the development of the Landscape and Biodiversity Strategy at the detailed design stage of the Proposed Scheme. An outline plan of the proposed habitat creation and enhancement measures within the FCA are displayed on Figure 3 (FCA Landscape and Biodiversity Plan) (document reference 8.5.2.3). Given the small-scale nature of the works which are localised and confined to the grassland only, there would be a short-term loss of habitat which would be negative. With reinstatement and enhancement proposals, which would be included in the updated OLBS, the effects would become positive in the medium-long term. As a result it is anticipated that there would be no change to the significance of effects as presented in the original assessment for the Proposed Scheme overall. There would not be any new significant effects when treated alone, when considered as part of the Proposed Scheme, or cumulatively with other plans and projects. An updated habitat survey specific to the FCA was undertaken on 23 November 2022 to reconfirm the ecological baseline, details of which are provided in Appendix 4 (Ecology Survey Technical Note) (document reference 8.5.3.4) and to assess any potential changes in support of this environmental appraisal. The results of the habitat survey indicate that the ecological baseline remains the same as the previous habitat survey and assessment carried out in 2021. No new habitat types or habitat features were identified, and no additional evidence of protected and notable species was recorded. Given the scale and nature of the FCA works including confirmation that the ecological baseline remains unchanged, the FCA works would not alter the significance of effects reported in the ES. If PC-01 is accepted into Examination, the Applicant will update the Biodiversity Net Gain Assessment (APP-196) to account for these proposals.	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 9: Landscape and Visual	The introduction of the defined FCA and associated reprofiling would not significantly change the landscape character of the affected field and adjacent landscapes and would also afford opportunities for further partial screening of the Drax complex from the north. As measures would be implemented to create naturalistic contours through habitat creation and enhancement proposals, this would integrate the proposed FCA and earthworks with the existing landscape and surrounding topography and provide opportunities for enhanced landscape connectivity. It is therefore anticipated that there would be no new or different significant effects during construction or operation.	The change would not result in any new or different significant effects from those described in the ES.
Chapter 10: Heritage	Based on available historic mapping, the area has been used for agricultural purposes since at least the 1880s through to the present day. There are no recorded archaeological sites within the Order Limits of the FCA or within 200 m. While the area has potential for previously unrecorded buried archaeological remains to be located, this potential is considered to be low based on desk-based assessment work and the results of previous archaeological investigations in the area. Ground Investigations within the FCA suggest that the bund running from east to west in the north of the area was constructed from waste/scraped material during the construction of Drax Power Station. The Proposed Works in the area would require ground-breaking activities, which have the potential to disturb any buried archaeological remains however, the presence of such remains is considered unlikely based on previous archaeological investigations in the area. In accordance with the recommendations in Chapter 10 (Heritage) of the ES (APP-046), due to the intrusive nature of the works a suitable form of mitigation, such as an archaeological watching brief, would be agreed with the LPA before construction would commence. This would be part of	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	the wider watching brief detailed in measure H3 in the REAC (AS-027) which will be secured by requirements in the DCO, to ensure that archaeological remains are not removed without record. It is therefore anticipated that there would be no new or different significant effects during construction. There would be no potential impacts to heritage during operation as any archaeology would have been removed during the construction works.	
Chapter 11: Ground Conditions	The proposed FCA works would provide additional floodplain compensation for the Proposed Scheme. There could be a potential impact associated with the introduction of these new flood waters which would change the conceptual model discussed in Appendix 11.1 (Phase 1 Preliminary Risk Assessment) (APP-156, APP-157) of the ES. To inform consideration of this, a ground investigation comprising six trial pits (to a maximum depth of 3.8m below ground level) was undertaken on 18 October 2022 to determine ground conditions and assess potential risks to receptors including human health and controlled waters associated with the proposed works. Soil samples were retrieved and submitted for a range of chemical analyses, the results and conclusions of these works are provided within Appendix 1 (FCA Soil Testing Technical Note) (document reference 8.5.3.1). The ground investigation reported similar ground conditions across the FCA. Made Ground has been identified at each discrete location, predominantly comprising a soft to firm sandy gravelly clay with various gravel inclusions, and frequent relic organic matter. It is considered that the Made Ground soils encountered are likely to represent reworked natural soil materials with some anthropogenic inclusions. The Made Ground is underlain locally by superficial deposits of Alluvium, and widely by laminated clay of the Hemingbrough Glaciolacustrine Formation. No visual or olfactory evidence of contamination was identified. No significant contamination has been identified within soils protective of human health. Soil leachate results have been utilised to assess the risk to Controlled Water receptors. Although	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	exceedances have been identified, they are generally marginal in nature (i.e., within one order of magnitude) of the conservative screening values. The risk to Controlled Water receptors is therefore not considered to be significant nor preclude the use of the area as a proposed flood compensation area. Additionally, the materials are considered suitable for re-use on-site to form a landscaping bund as part of the landscape scheme. An ALC survey undertaken in November 2022 classified the soils within the proposed FCA as Grade 3b (non BMV). A Soil Handling Management Plan will be produced (as already committed to in Ref ID GC2 in the REAC (AS-027)) which will detail clear guidance on the methods of recovering, storing and reinstating the soils whilst minimising a loss in quality and function during construction. The FCA is currently used for sheep grazing, however upon completion of the works, the FCA would be reinstated as grassland and form part of the updated OLBS. This would represent a permanent loss of approximately 2.2 hectares of non BMV land. However removing land from agricultural use and including it within the Landscape and Biodiversity Strategy presents opportunities for improved soil health (improved soil structure, carbon sequestration, soil biodiversity) as the land would not be exposed to degradation from ploughing, pesticides and herbicides and compaction from farm vehicles. All other elements present a no change scenario and therefore the findings within Chapter 11 (Ground Conditions) of the ES (APP-047) remain unchanged. Appropriate parts of the requirements of the DCO, such as the requirement to carry out a ground investigation (to include groundwater monitoring/sampling), a Materials Management Plan, and a Soil Handling Management Plan would also apply at this location. Therefore it is not anticipated that there would be any new or significant effects as a result of PC-01.	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 12: Water Environment	The ES assessment of impacts on the Water Environment was based on provision of appropriate flood compensation mitigation, as required. At the time of preparation of Chapter 12 Water Environment (APP-048) and the associated Flood Risk Assessment (FRA) (APP-160), the location for the flood compensation had not been confirmed. The outcomes of the original assessment remain valid for the following reasons: • The new approach and additional detail on the provision of the flood compensation builds upon that assessed within Chapter 12 Water Environment (APP-048) and the FRA (APP-160) meaning that the conclusions will remain the same; • The location is outside the current floodplain (the Proposed Scheme is only at risk during the future design year events), there is some interaction with the 1 in 1000 year floodplain but under NPPG this is used for the consideration of the residual risk; • The location is not adjacent to any waterbodies; and • The proposed works do not extend below natural ground surface level, therefore no significant groundwater quantity effects from or to groundwater are therefore anticipated; • The overlying low permeability superficial deposits are expected to offer a reasonable degree of protection to the underlying Sherwood Sandstone principal aquifer from impacts due to potential spillage or leakage of pollutants during the proposed works. Additionally standard pollution prevention measures outlined in a CEMP would mitigate the risk further so that no significant groundwater quality effects during the proposed works are anticipated. Note, this assessment has not considered the potential for mobilisation of existing contaminants.	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	It is therefore anticipated that there would be no new or different significant effects during construction. It is also anticipated that there would be no potential impacts to the water environment during operation. The Flood Risk Assessment (FRA) (APP-160) would be updated should PC-01 be accepted to enable the delivery of the FRA works to be secured through the DCO. Those parts of the FRA that would be updated are provided in Appendix 5 (Flood Risk Assessment Extracts) of this report (document reference 8.5.3.5).	
Chapter 13: Materials and Waste	The proposed FCA works include lowering the existing ground surface to provide a gradual slope along the northern slope of the field. The excavated arisings (totalling 2,505 m^3) of soil / grassland are to be placed onto the central area of the FCA within the FCA Order Limits. As there is no removal and disposal of the excavated earthworks, there would be no change to the significance of effect findings outlined in Chapter 13 (Materials and Waste) (APP-048) of the ES.	The change would not result in any new or different significant effects from those described in the ES.
Chapter 14: Climate Change Resilience	The FCA would be provided within land owned by the Applicant, to offset the increase in built footprint as a result of the Proposed Scheme, and the creation of the FCA would prevent adverse impacts on third parties during the design flood event. The climate resilience assessment deemed the flood risk to not be a significant impact, which would still be the case.	The change would not result in any new or different significant effects from

Topic	Environmental Appraisal of the Change	Change to Significant Effects
		those described in the ES.
Chapter 15: Greenhouse Gases	The proposed FCA requires the temporary excavation of soil / grassland material. The excavated arisings would be reused on site and grassland seeded with a neutral grassland mix. No trees or hedgerows will be removed as part of the FCA works. The temporary loss of grassland would be in addition to the land use, land use change and forestry (LULUCF) GHG emissions calculated in Chapter 15 (Greenhouse Gases) (APP-051) of the ES, which comprise the East Construction Laydown Area, Woodyard, Habitat Provision Area, and the Off-site Habitat Provision Area. The GHG emissions from the LULUCF calculated for the ES was 28 tonnes of carbon per year, a small quantity in context of the whole scheme, which was calculated as -7,972,111 tonnes CO_2e per year. The temporary loss and reinstatement of grassland required for the FCA may result in an increase to the LULUCF GHG calculations reported in the ES. However, given the scale of the FCA, this increase is anticipated to be small and insignificant. Furthermore, in context of the net GHG emissions for the Proposed Scheme (a significant beneficial effect), the temporary loss and reinstatement of grassland for the FCA would comprise a short term increase in GHG emissions which would assist with longer term benefits. In summary, the FCA works would not change the overall findings of Chapter 15 (Greenhouse Gases) (APP-051) of the ES.	The change would not result in any new or different significant effects from those described in the ES.
Chapter 16: Population, Human Health and	The introduction of the FCA would not affect accessibility for pedestrian users of the Public Right of Way located to the north. However, there may be potential short term impacts on human health for users of the Public Right of Way as a result of possible amenity effects during construction, but these would be mitigated through measures already included in the REAC (AS-027) (to be secured through the CEMP) including measures to manage noise and dust from the FCA works.	The change would not result in any new or different

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Socio-economics	The works take place on land owned and controlled by the Applicant. The land is currently used for sheep grazing and the ground cover would be reinstated to grassland on completion of the works (further details of which are provided in the Ecology section of this table). Access would be via existing internal routes within the Drax Power Station Site which are not publicly accessible to walkers, cyclists, and other non-motorised users. Total construction duration would be short term and temporary (approximately four weeks), and no receptors relevant to the assessment of Population, Health, and Socio-economics are anticipated to experience effects with mitigation measures in place. Once complete and operational, there would not be any effects to these receptors.	significant effects from those described in the ES.
Chapter 17: Major Accidents and Disasters	The assessment of the vulnerability of the Proposed Scheme to a major accident and / or disaster (MA&D) during the construction and operational phases determined that the risk associated with fluvial flooding and the failure of flood defences was managed to be as low as reasonably practicable (ALARP) with the mitigation measures proposed in the DCO Application. A review of the MA&D Long List (Appendix 17.1) (APP-171) of the ES indicates that the location and topography of the proposed FCA, within the current Drax Power Station perimeter fence, does not introduce any new MA&D risks. The Major Event Type, Landslides, has been considered as the new FCA would require cuts to increase the volume available for flood waters. The floodplain compensation would be provided by lowering the existing ground surface (i.e. cut) to provide a minimum volume of 880 m^3. The existing land surface is at approximately 6.6m AOD, which is above the design flood level of 4.36m AOD. It is understood that the slope would be gradual following the works and thus landslides are highly unlikely to occur. On this basis, it is considered that the vulnerability of the Proposed Scheme to a MA&D would not change due to the location of the FCA.	The change would not result in any new or different significant effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 18: Cumulative Effects	It is shown in the environmental appraisal for each ES chapter above that PC-01 would not result in any new or different significant effects from those described in the ES in relation to each chapter. Therefore, it is considered that PC-01 would not result in any additional intra-project cumulative impacts from those presented in Chapter 18 (Cumulative Effects) (APP-054) of the ES. Due to the size and nature of PC-01, it is not anticipated that there would be any inter-project combined effects with the developments included within Appendix 18.2 (Short List of Other Developments) (AS-013) of the ES. On this basis, the findings of Chapter 18 of the ES remain as reported.	The change would not result in any new or different significant effects from those described in the ES.

5.2.1. Overall, it is not anticipated that there will be any new or different significant effects when treated alone, when considered as part of the Proposed Scheme, or cumulatively with other plans and projects as a result of PC-01 during construction, operation or decommissioning.

5.2.2. Based on the above assessment undertaken for PC-01, should PC-01 be accepted, a number of mitigation measures would be added to the **REAC (AS-027),** which would be updated and submitted into the Examination of the Proposed Scheme. The suggested additions are set out in **Table 5-2** below. If PC-01 is accepted into Examination, the REAC would be updated accordingly.

Table 5-2 - Register of Environmental Actions and Commitments - Suggested Additions in Relation to PC-01

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation

T4	Work Nos. 7 and 8 will be programmed outside the peak construction periods.	Proposed Change Application Report	Construction	DCO Requirement	The CTMP will be approved by the LPA.	Main Contractor
E15	As part of the FCA works, the excavated material will remain within this grassland and be suitably sited. This relocated material will form part of habitat creation and enhancement proposals in this area, in the form of an enhanced grassland strip. Upon completion of the works, the FCA will be reinstated as grassland. A planting scheme will be implemented and the creation of naturalistic contours will integrate the proposed FCA with the existing landscape.	Proposed Change Application Report	Construction Operation	DCO Requirement	Landscape mitigation, planting and design will be carried out in line with the LBS, which will be developed in accordance with the OLBS, to be approved by the LPA following consultation with NYCC.	Main Contractor The Applicant
WE15	The FCA will be delivered prior to the completion of construction following re-consultation on the details of the flood compensation area with the Environment Agency.	Proposed Change Application Report	Detailed Design	DCO Requirement	Production of updated FRA Detailed Design This will be recorded on as built drawings	The Applicant / Designer

5.3. ANY REQUIRED AMENDMENTS TO DCO DOCUMENTATION

5.3.1. **Table 5-3** details the amendments to Application documents that would be required because of PC-01 and sets out where extracts showing the relevant changes can be found in the appendices to this Proposed Changes Application.

5.3.2. It should be noted that the changes required because of PC-01 involve changes to the Book of Reference and Land Plans, which are documents that need to be updated for PC-02 as 'supplements' in line with Regulation 5 of the CA Regulations. As such, Table 5-3 refers to these supplements, rather than 'extracts'. The changes in the Book of Reference have been colour coded in the clean version of the document to differentiate between the changes required as a result of PC-01(in blue) as opposed to PC-02 (in green in relation to the CA Additional Land, and in red for the temporary possession plots).

5.3.3. If PC-01 is accepted into Examination, the Applicant would as soon as possible thereafter submit fully updated versions of the documentation that is appended to this application, as well as the other documents referenced in this table, in clean and track changed form.

Table 5-3 - Amendments to Application Documents as a Consequence of PC-01

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
1.4	AS-024	Application Tracker	Addition of documents associated with PC-01	To be issued if Proposed Change is accepted
1.7	APP-007	Glossary	Addition of new terms and definitions associated with PC-01	To be issued if Proposed Change is accepted
2.2	APP-009	Land Plans	To include additional land required to provide PC-01, including an update to the Key Plan; an update to Sheet 1 to incorporate adjusted Order Limits for PC-01. As the works are taking place on the Applicant's land, no land powers are sought over this area.	These changes shown in the updated Land Plans submitted as Appendix 9. These plans will be formally submitted as an updated revision of 2.2 / APP-009 if PC-01 is accepted for consideration.

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
2.3	OD-005	Works Plans	To add details for PC-01 including updates to Key Plan and new Work No.7 for PC-01 (shown on Sheet 17).	The changed sheets have been extracted and appended as Appendix 10 (document reference 8.5.3.10). An update to the full plan set incorporating these changes will be formally submitted if PC-01 is accepted for consideration.
2.4	APP-011	Access and Rights of Way Plans	Update of Key Plan and sheet 1 to include revised Order Limits for PC-01 (update of Sheet 1).	The changed sheets (alongside those sheets required to change for PC-02) have been extracted and appended as Appendix 11 (document reference 8.5.3.11). An update to the full plan set incorporating these changes will be formally submitted if PC-01 is accepted for consideration
3.1	AS-025	Draft Development Consent Order	Changes to Schedules 1	Track changes to this schedule presented in Appendix 12 (document reference 8.5.3.12). If change PC-01 is updated, the full DCO will be submitted in clean and track changes form.

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
3.2	OD-007	Explanatory Memorandum	Changes arising from PC-01	Track changed version of Part 5 of this document (being the only part of it that has changed) presented in Appendix 13 (document reference 8.5.3.13). If the Proposed Change is accepted, the EM would be updated in clean and track changes form to account for these changes and those in the DCO submitted alongside the Applicant's Response to Relevant Representations.
4.3	AS-002	Book of Reference – Clean	Changes arising from PC-01	This is presented in the full form of the document given its format and the CA Regulations requirements, in Appendix 16 (document reference 8.5.3.16).
4.3	AS-003	Book of Reference - Tracked	Changes arising from PC-01	This is presented in the full form of the document given its format and the CA Regulations requirements, in Appendix 17 (document reference 8.5.3.17).

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
6.3.5.1	OD-009	Construction Traffic Management Plan	Updated to include changes arising from PC-01	To be issued if Proposed Change is accepted
6.3.12.1	APP-160	Flood Risk Assessment (including Appendix I – Flood Risk Maps)	Updated to include changes arising from PC-01 including update to Appendix I – Flood Risk Maps	Relevant extracts are set out in Appendix 5 (document reference 8.5.3.5). Full updated version to be issued if Proposed Change is accepted
6.5	AS-027	Register of Environmental Assessments and Commitments	Updated to include changes arising from PC-01 - See Table 5.1 above	Updated version to be issued if Proposed Change is accepted to reflect the changes highlighted in Table 5-2 above
6.6.1	APP-180	Outline Landscape and Biodiversity Strategy	Updated to include measures proposed in this Report in relation to PC-01	To be issued if Proposed Change is accepted
6.10	App-196	Biodiversity Net Gain Assessment	Updated to account for PC-01 and PC-02 and the biodiversity measures as part of them. Updated document will also account for the matters set out in the	To be issued if Proposed Change is accepted

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
			Applicant's response to Relevant Representations.	

6. PROPOSED CHANGE 02

6.1. DESCRIPTION OF THE CHANGE

6.1.1. Two electrical 11kV overhead lines (OHL1 and OHL2) and the telecommunications line (TCL1) ('the Lines') currently cross the proposed AIL route from the Port of Goole to Drax Power Station, north of the M62. The locations of these Lines are shown on Plates 6-1 and 6-2, which show indicative designs and illustrative layouts.

6.1.2. The proposed works to each of the OHLs and TCL1 is as follows (from east to west in each case):

a. OHL1 (see Plate 6-1):
   i. Pole L3043/00-08 is to be retained.
   ii. The line between Pole L3043/00-08 and Pole L3043/00-09 is to be retained, but may require restringing, subject to further investigation of the assets.
   iii. Pole L3043/00-09 is to be retained.
   iv. The existing overhead line between Pole L3043/00-09 and Pole L3043/00-10 is to be removed.
   v. A proposed new Pole is to be constructed north of the A645 between Pole L3043/00-09 and Pole L3043/00-10.
   vi. A proposed new overhead line is to be constructed between the existing Pole L3043/00-09 and the proposed new Pole.
   vii. Pole L3043/00-10 is to be removed.
   viii. The existing overhead line between Pole L3043/00-10 and Pole L3043/00-10A is to be removed.
   ix. Pole L3043/00-10A is to be retained.
   x. A proposed new underground cable is to be installed between the proposed new Pole and Pole L3043/00-10A. The proposed cable running west from the proposed new Pole (shown in dark green on Figure 6-1) will be installed using trenching and cut and fill. At a point due north of the A645, a section proposed underground cable would use HDD or auger boring to be installed under the carriageway (shown in light green on Figure 6-1). Trenching and cut and fill would be used to connect the cable from the HDD/auger bore to Pole L3043/00-10A.
   xi. A compound is proposed to be located north of the eastern HDD access point.
   xii. The line between Pole L3043/00-10A and the next Pole to the west is to be retained, but may require restringing, subject to further investigation of the assets, and for this reason land up to and around the most westerly pole is included in the land proposed to be included within the revised Order Limits.

b. OHL2 (see Plate 6-2):
   i. Pole L3210/00-1 is to be retained.

ii. The line between Pole L3210/00-1 and Pole L3210/00-2 is to be retained, but may require restringing, subject to further investigation of the assets
iii. Pole L3210/00-2 is to be retained.
iv. The line between Pole L3210/00-2 and Pole L3210/00-3 is to be removed.
v. Pole L3210/00-3 is to be removed.
vi. The line between Pole L3210/00-3 and the pole due north of Pole L3210/00-3 is to be removed.
vii. A proposed new overhead line is to be constructed between Pole L3210/00-2 and the two proposed new Poles to the northwest, which will be arranged in a linear route to the second new Pole, which will be located south of the A164 Rawcliffe Road on the opposite side of the carriageway to the proposed new HDD/auger boring underground cable access point (see below).
viii. A proposed new underground cable is to be installed between the existing cable at the Pole due north of Pole L3210/00-3 and the westernmost new Pole south of the A164 Rawcliffe Road. The proposed new cable running west from the Pole due north of Pole L3210/00-3 (shown in dark green on Figure 6-1) will be installed using trenching and cut and fill. At a point due north of the A164 Rawcliffe Road, a section of proposed underground cable is to be constructed under the carriageway and is subject to further discussion; this section would either use HDD/auger boring or trenching and cut and fill (shown by a combined light and dark green line on Figure 6-1).
ix. Construction compounds are proposed to be located north of the proposed new underground cable and south of the westernmost proposed new Pole.

c. TCL1 (see Plate 6-1):
i. Pole TP3 is to be retained.
ii. The line between Pole TP3 and Pole TP4 is to be removed. The line between Pole TP4 and Pole TP2 is to be removed.
iii. A proposed new overhead line is to be constructed between Pole TP3 and Pole TP2. This new line will be supported by a proposed new Pole to be erected on land between Pole TP3 and TP2.
iv. A proposed new underground cable is to be installed between Pole TP4 and the proposed new Pole. The underground cable will be constructed either using HDD/auger boring or using an existing utilities duct. The more appropriate option will be determined upon further investigation of the site.
v. Construction compounds are proposed to be located north of the proposed new Pole and south of Pole TP4.
vi. The line between Pole TP2 and Pole TP1 is to be retained, but may require restringing, subject to further investigation of the assets, and so is included in the land proposed to be included within the revised Order Limits.

6.1.3. Access arrangements to each of the OHLs and telecommunications lines are as follows:

a. OHL1 (see Plate 6-1):

vii. The eastern Poles will be accessed via a road off the A614 Rawcliffe Road from the south. Temporary access is required for construction and permanent access is required for maintenance.

viii. The compound and Poles northeast of the A645 will be accessed via an existing access point to the north. This has been identified to minimise impacts on farmland. Temporary access is required for construction and permanent access is required for maintenance.

ix. The Poles southwest of the A645 will be accessed via a private access road off the A614 Rawcliffe Road. Temporary access is required for construction and permanent access is required for maintenance.

a. OHL2 (see Plate 6-2):

x. The Poles and trenching locations north of the A164 Rawcliffe Road will be accessed via Elite Road (private access) and an existing field access to the north. Temporary access is required for construction and permanent access is required for maintenance.

xi. The Poles located to the south of the A164 Rawcliffe Road will be accessed via an existing access and farm track. Temporary access is required for construction and permanent access is required for maintenance.

a. TCL1 (see Plate 6-1):

xii. Pole TP1 and TP2 will be accessed from the west via a road off the A164 Rawcliffe Road. Temporary access is required for construction and permanent access is required for maintenance.

xiii. Pole TP3 will be accessed from the east via an access point to the north of the A164 Rawcliffe Road. Temporary access is required for works to TP3 associated with taking down lines and restringing works and permanent access is required for maintenance.

xiv. Pole TP4 will be accessed from the east via an access point to the south of the A164 Rawcliffe Road. Temporary access is required for construction and permanent access is required for maintenance.

xv. If required, a temporary bridge may be installed over the drain to the south of Pole TP4 for access to a proposed compound. Temporary access is required for construction.

Plate 6-1 - Drawing Showing Location of OHL1 and TCL1

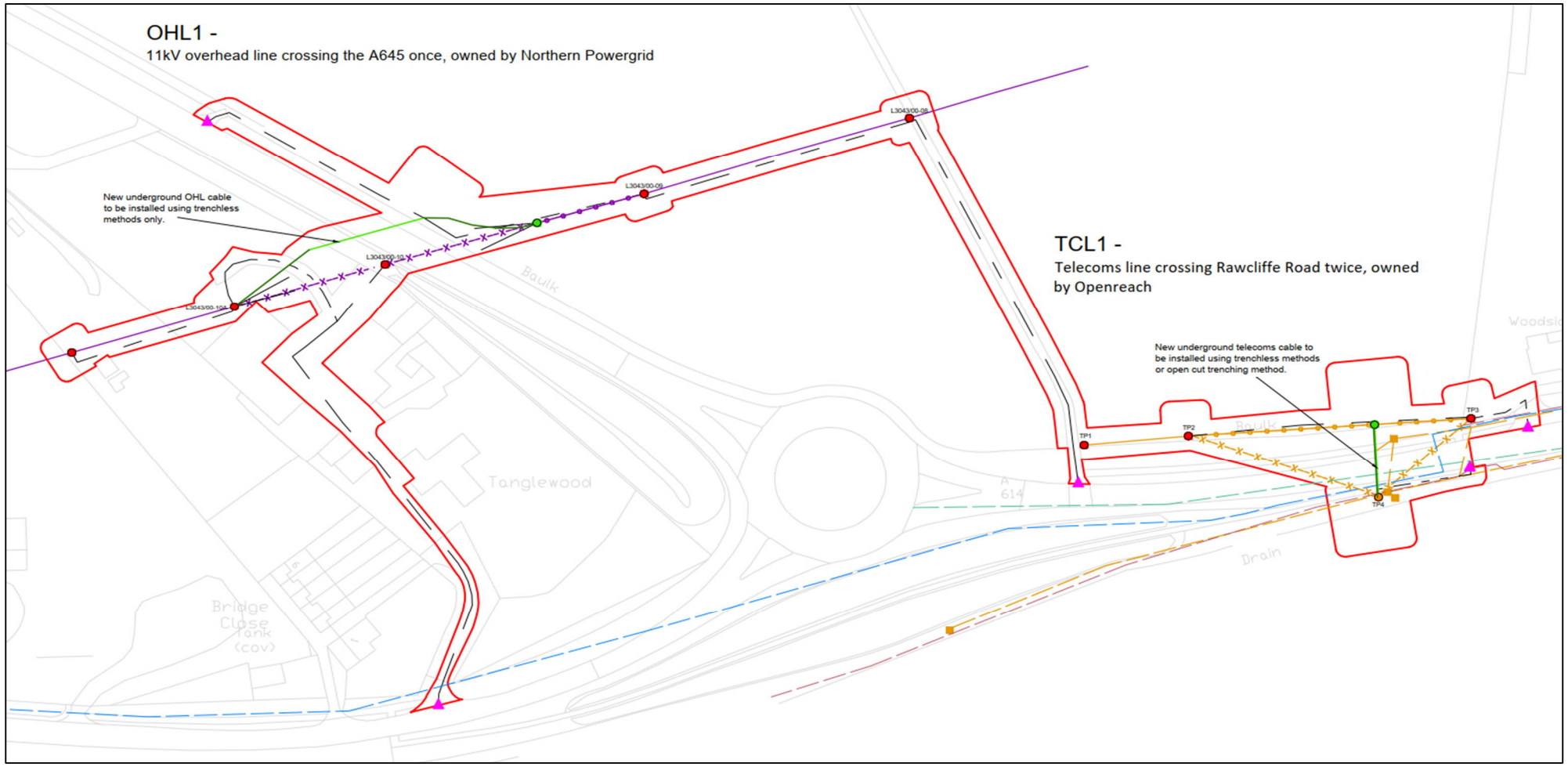
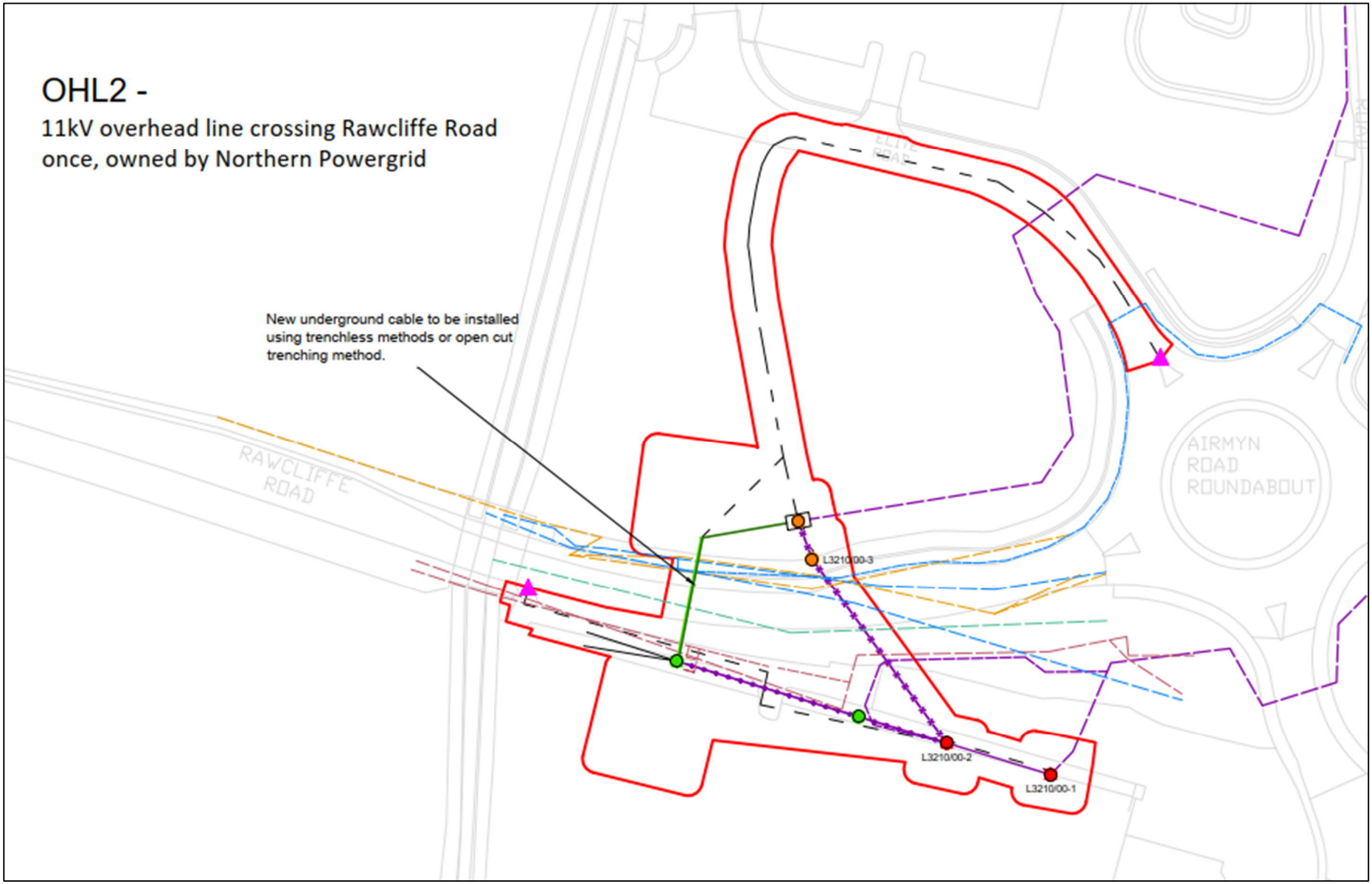


Plate 6-2 - Drawing Showing Location of OHL2



6.1.4. It had been assumed for the submitted DCO Application that the Lines would be able to be either dropped or propped up to allow the AILs to pass underneath them.

6.1.5. Following further investigation and consultation, it is now considered that this option is sub-optimal due to the potential disruption involved to the customers of these utility lines. Further detail regarding alternatives is set out under Section 3.3 of the Statement of Reasons (Appendix 14, document reference 8.5.3.14). It is therefore proposed to underground the electrical and telecommunications lines. This will result in additional land being required to carry out these works.

6.1.6. Once completed, there will be no further works required and the land affected would be reinstated to the pre-existing condition.

6.1.7. New easements, and rights for access, maintenance and repair/replacement would be sought via the DCO on behalf of the asset owners to ensure the altered alignments of assets (be they above or below ground) are accounted for within the titles of the affected land. This would reflect that such rights already exist in relation to the current overhead line but now need to be adjusted for the new routing of the lines and the different rights required for an undergrounded line, compared to overground.

6.1.8. The land on which the PC-02 is proposed to be located is adjacent to the A614 and A645. This is approximately 4 km southeast of the Order Limits as set out in the Application (EN010120). This is shown on Plates 2-2 and 2-4, and on the updated plans submitted with this Proposed Changes Application including relevant updates to Land Plans in relation to Proposed Changes at Appendix 9 (document reference 8.5.3.9), updates to Works Plans in relation to the Proposed Changes at Appendix 10 (document reference 8.5.3.10) and updates to Access and Rights of Way Plans at Appendix 11 (document reference 8.5.3.11).

PROPOSED METHODOLOGY

6.1.9. The actual installation method appropriate for the undergrounding of the cables (for both the electricity and telecommunications overhead lines) may vary and is dependent on further investigations and, ultimately, a design and cost estimate which will be provided by the asset owner to the Applicant. This investigation and design process is ongoing and will take into consideration consultation responses received from interested parties affected by the proposed works (please refer to Table 6-2 REAC Ref ID G21 and PH3). As such, in considering PC-02, the environmental appraisals have considered the impacts that could arise from a trenchless installation (via HDD or thrust bore or auger bore techniques) or a trenched installation (via an open trench).

6.1.10. Further information on the likely methodology for each type of installation method is provided below.

HDD Methodology

6.1.11. HDD would use a surface launched drilling rig ('the Rig'). An entry pit and exit pit would be excavated within the driving compound ('the Driving Compound') and receptor compound ('the Receptor Compound') respectively. A steerable boring head would then be pushed through the ground from the Driving Compound while being rotated. When the pilot bore is complete, it would be enlarged to the required diameter by pulling a reamer back towards the drilling machine. When the hole has been opened to the required size, the cable duct would be pulled into place and the cables installed. It is assumed that all cables undergrounded will be covered with a form of protection (methodology currently unknown) to ensure they are not affected by any future ground movements.

6.1.12. Drilling fluid (fluid makeup currently unknown, likely to be made up of predominantly water) would be used to assist in cutting the soil and in removing cuttings from the bore. Pumping via a diesel pump would be used to pump the slurry out of the drive pit (detailed management plan currently unknown but would be set out in a CEMP). Additional works may also be required to align the existing overhead lines with the HDD sections. This may be done by providing a new OHL Pole adjacent to the road or a new OHL connection between existing and new poles, via open cut across the existing field or via HDD.

6.1.13. Some restringing works may also be required, and it has been assumed that for the electrical OHLs that restringing works would be undertaken to the next pole along the circuit at each end of the proposed works. Some short-duration, temporary traffic management, e.g. traffic lights, may be required to enable the works – this would be confirmed through the detailed CTMP.

6.1.14. To facilitate the works, a small working compound would be set up for each of the lines as shown in Plates 6-3 and 6-4. It is anticipated that these working compounds would be 20m x 20m for the Driving Compound. The working compounds would be suitably fenced using, for example, Heras fencing and would be used to provide the working area for the HDD rig, a self-contained welfare unit and materials storage. Materials such as cabling and duct work would be delivered "just in time" before the works. A smaller area would be required for the Receptor Compounds which would be approximately 5m x 7m. However, to provide flexibility for the Driving and Receptor Compounds at either end of the HDD until full details are known, a maximum compound size of 20m x 20m has been provided for within the revised Order Limits at each end of a proposed HDD section.

6.1.15. For **OHL1** the HDD Driving Compound and Receptor Compound have been defined due to existing constraints.

Plate 6-3 – Plan showing Proposed Areas of Works for HDD (OHL1 and TCL1)

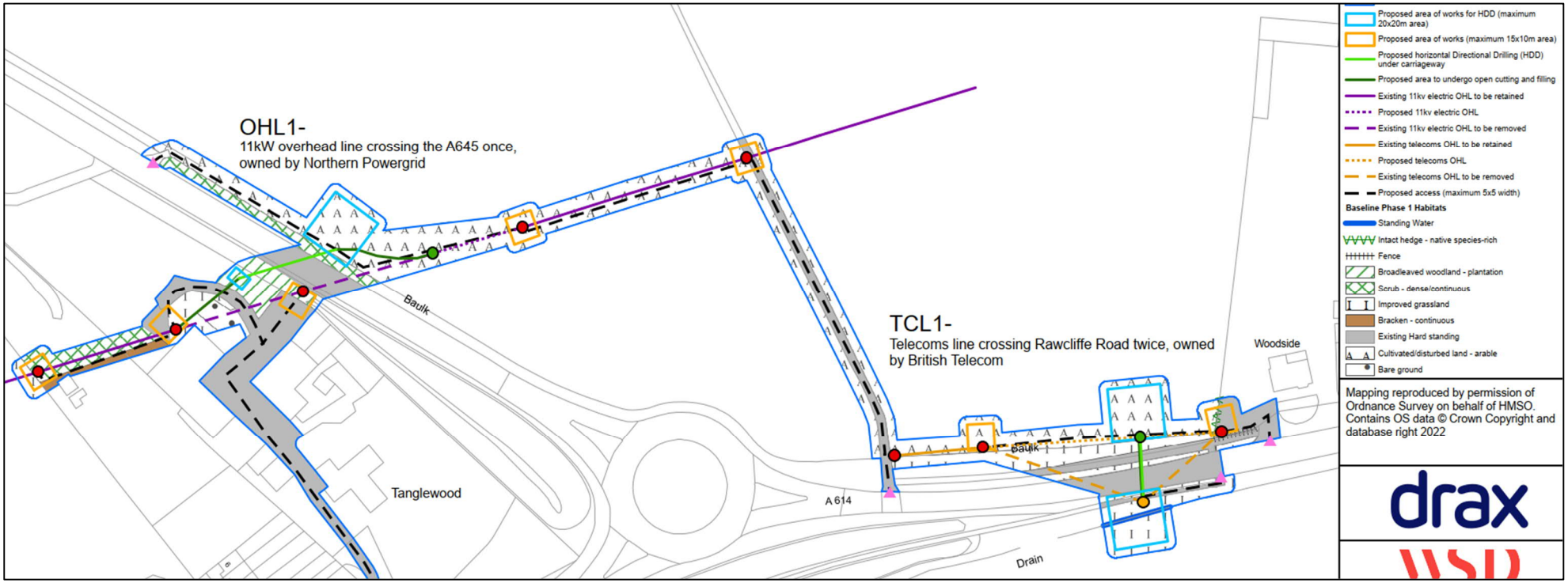
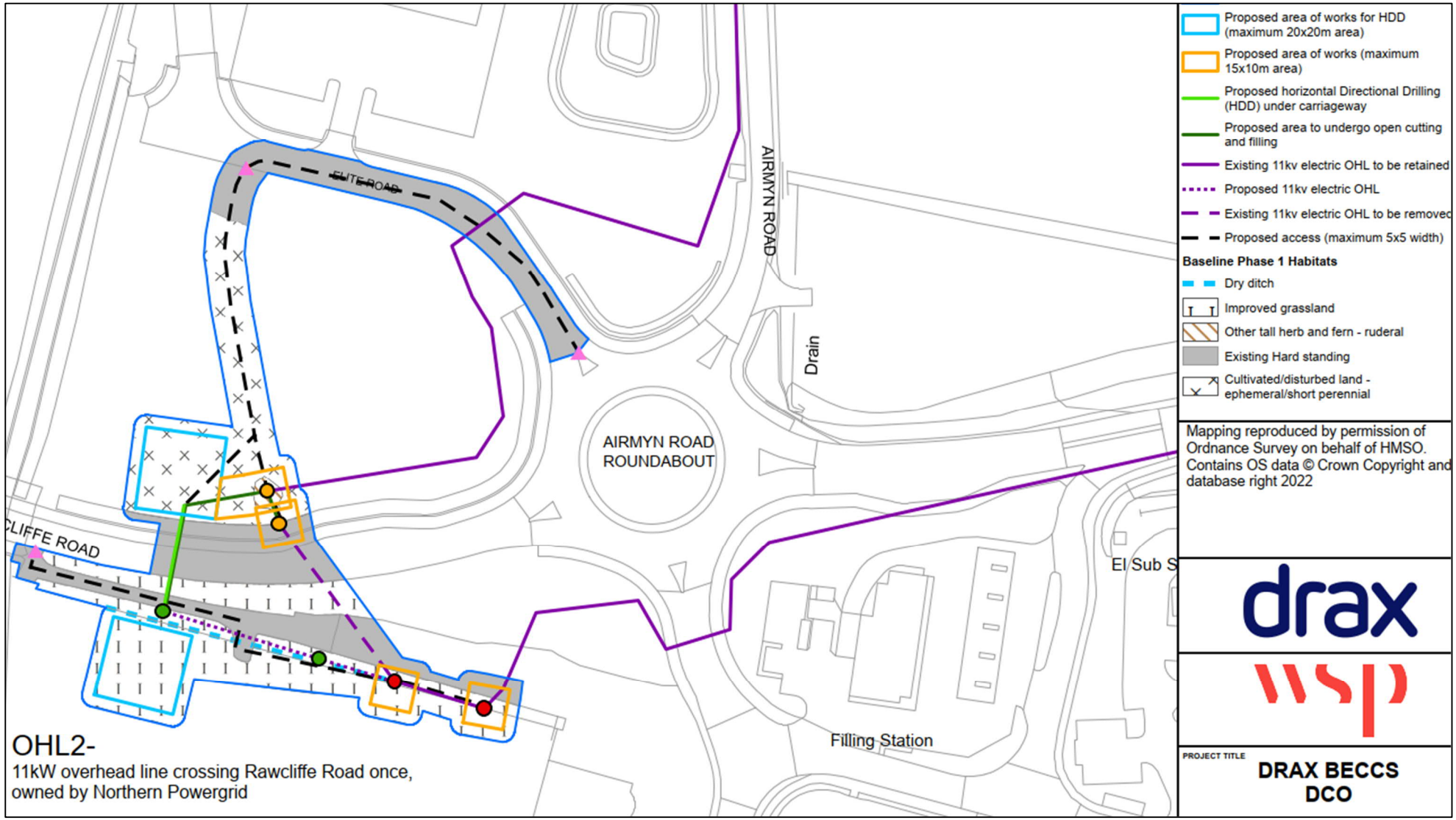


Plate 6-4 – Plan showing Proposed Areas of Works for HDD (OHL2)



Thrust Bore/Auger Bore Methodology

6.1.16. Auger boring (also referred to as thrust boring) is a trenchless boring method. It represents an economical technique to create underground crossings for pipes and ducts under obstructions such as roadways, railways or waterways whilst avoiding any interruption or disturbance.

6.1.17. Auger boring is a combined jacking and drilling method. Starting from a launch pit located within the Driving Compound, the auger, which is placed in a steel casing, is rotated to drill into the soil and excavate the ground whilst a jacking rig pushes the auger and casing forward. As the bore head moves forward towards a reception pit, casings and auger screws are added and driven behind the preceding sections. Excavated material is moved behind the casings and can be removed by hand, mechanically or using muck skips.

6.1.18. Auger boring can be either guided or unguided. Unguided auger boring is commonly used to install ducts where the exact line and level are not critical. The launch pit is created as a battered or supported excavation with a base for the boring rig. The base is aligned to an accurate set line and level of the required boring trajectory. The pits would be backfilled and the surface reinstated once the works are complete.

6.1.19. Guided auger boring is used where the crossing alignment must be controlled more strictly, such as in highly congested areas or close expected proximity to other underground utilities. Compared to unguided auger boring, guided auger boring utilises a pilot drill which is installed in front of the auger head and steel casings. The pilot drill is fitted with an optical guidance system to inform steering corrections as required to drill a highly accurate pilot tube. As with unguided auger boring, the pits would be backfilled and the surface reinstated once the works are complete.

Trenched Methodology

6.1.20. Following confirmation of the precise cable routing and identification of the minimum trench width, if this method is used, excavation works would create an open cut trench of a depth adequate for achieving the minimum depth of 750 mm (in carriageway) between the finished ground level and the top of the duct containing the newly installed cable, as required under roadways. For the footway, open land/ and made ground, the cable can be laid directly, and ducting is not required. The required depth of cover in the footway is 600 mm.

6.1.21. Based on Northern Powergrid’s regulations, underground cable installations across roadways require the installation of a second additional spare duct to one side, horizontally spaced with a separation of 300 mm centre-to-centre.

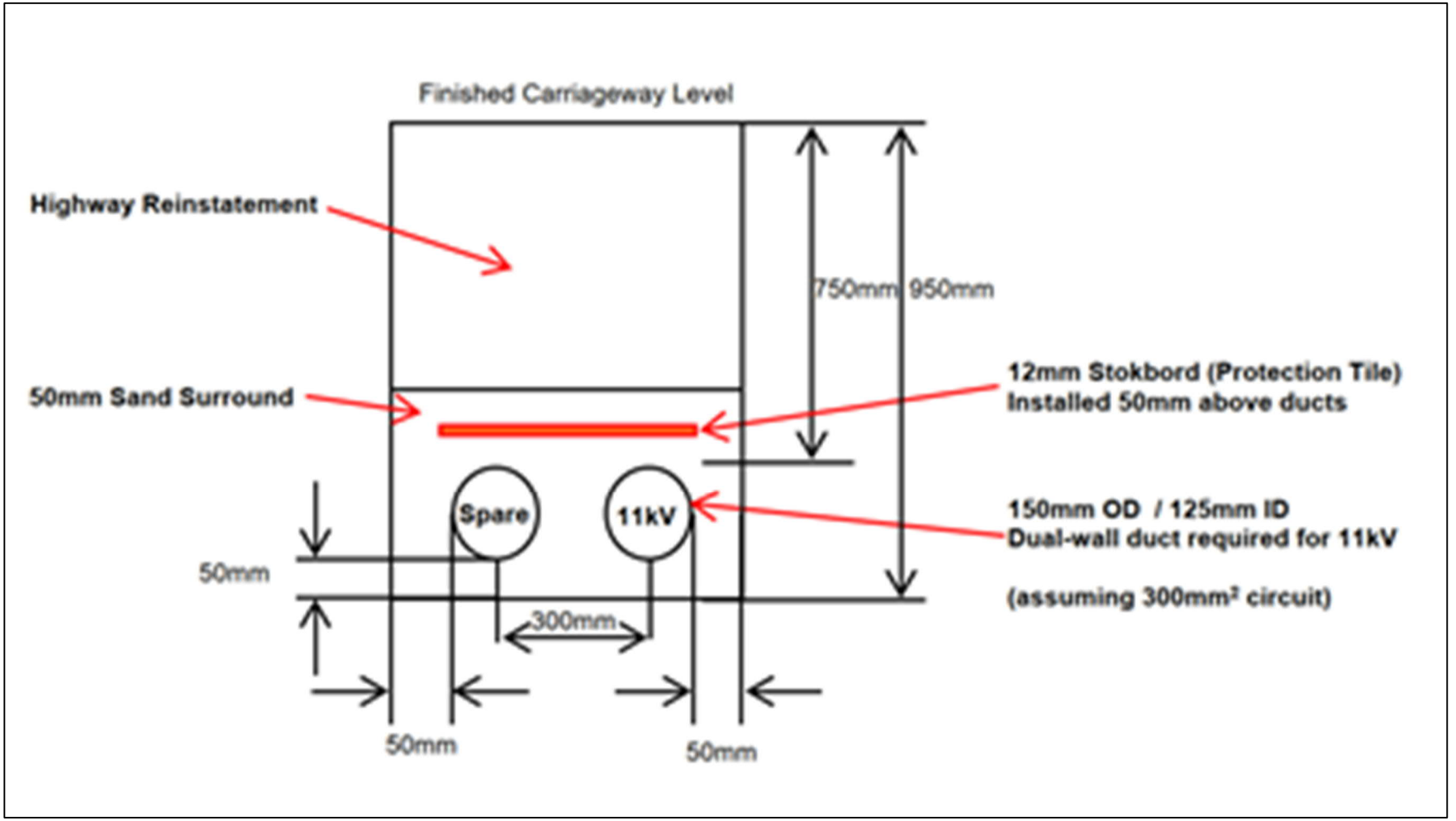
6.1.22. Depending on the road width, these require either a partial road closure with a traffic management system in place to enable single line traffic, or a full road closure with a traffic management system in place to divert traffic as required. Works requiring full

road closures would typically take place at night (but not late at night) to minimise the impact on traffic.

6.1.23. Where possible, excavated road surface materials and base foundations will be separately stacked from excavated sub-soils to facilitate re-use of excavated material for road foundations.

6.1.24. An indicative cross-sectional sketch of a typical road crossing is provided at Plate 6-5 below:

Plate 6-5 - Indicative Cross-Sectional Sketch of a Road Crossing



6.1.25. With these methods in consideration, the potential methodology for each of the lines is as follows:

OHL1

6.1.26. For OHL1 (a Northern Powergrid asset), a new wooden pole will be added on the eastern side of the A645, to provide an altered alignment for the OHL (to move it slightly further to the northwest) and the existing OHL eastwards from this new pole will require some restringing works. A short section is proposed to be installed via a trenchless construction from the new pole under the A645 from the farmland to the east of the road to the property identified as Tanglewood, to the west of the belt of trees on the western side of the road.

6.1.27. The Driving Compound is assumed to be on the eastern side of the road as this appears to be less constrained in terms of accessibility, with the smaller receptor compound proposed on the western side of the road, in a location between the existing belt of trees and shrubs and the internal private access track serving the property ‘Tanglewood’. It is proposed that the electrical cable will connect from the new pole on the eastern side of the A645, and will include an undergrounded section to an existing pole to the north of a building within the Tanglewood site installed via one of the methods referred to above under the A645, and open trenching between the receptor compound and the existing pole north of the building. Restringing may be required along the existing overhead line between the existing wooden pole to the north of the building and the next pole to the west.

6.1.28. The proposed works for OHL1 includes areas for temporary access for construction, and where necessary permanent rights may be required to allow for maintenance, repair and replacement in the future. It is assumed that an access of 5m width is suitable for all construction traffic. Areas are also included to provide a 5m offset of working area around each existing pole where works may be required for restringing or undergrounding of the cables, and a temporary works corridor to enable the restringing activities to be undertaken. The illustrative location of the HDD compounds are indicated on Plate 6-3. A similar location would be used for the alternative trenchless method of installation if this option is identified as the most appropriate method.

6.1.29. Temporary possession powers will be sought as part of the DCO for the realignment and trenchless and trenched undergrounding works, and realigned overhead line or underground cable sections and restringed sections, as appropriate.

6.1.30. New permanent rights for the benefit of the asset owner will be sought as part of the DCO for the retention, maintenance, repair or replacement of the asset along the altered alignment route (be that an altered OHL or a new undergrounded section).

6.1.31. Groundworks will be avoided around the existing electricity pole immediately to the west of the A645 within the tree belt boundary to Tanglewood, and works will be limited to removing existing OHLs and removing the existing wooden pole.

6.1.32. Where the proposed works will utilise existing accesses to properties, it is proposed that if any damage is caused to existing accesses by the works, that appropriate repairs are undertaken to maintain the condition of the access road/track to the same as it was prior to the commencement of works. This will be a commitment added to the REAC, Ref ID PH4.

6.1.33. Any land and habitat on which temporary works take place would be reinstated to its original condition on completion of the works as is required by the DCO temporary possession article. As set out in the REAC (Ref ID E17), works will be carried out in accordance with the recommendations contained on Figure 4 (OHL Landscape and Biodiversity Plan) (document reference 8.5.3.4).

OHL2

6.1.34. For OHL2 (a Northern Powergrid asset), it is assumed that the Northern Powergrid electrical cable is already undergrounded from the point of the second wooden pole on the land to the north of Rawcliffe Road - the pole immediately to the north-west of Pole L3210/00-3). The undergrounding of existing cables has been shown on the plans of the existing Northern Powergrid assets in this location, which indicate that the undergrounded cable heads from this pole generally in an easterly/north-easterly direction.)....

6.1.35. The proposed works to underground OHL2 would comprise either a trenchless installation method, or a trenched method, if appropriate, to enable the undergrounding of the electric cables under Rawcliffe Road, and underground connections via open trenching to the existing underground electricity cables on land to the north of Rawcliffe Road. It is anticipated that works to connect to the existing section of undergrounded cable will be required from the HDD compound (if this installation method is appropriate) to an area within 10m of the most northerly wooden pole via an open trench method.

6.1.36. At this stage, the direction and route of the existing underground cable from the pole are not known in detail, although it is anticipated that connection works to the existing underground cable would take place within a 20m x 20m area centred on the pole (noting that it is understood that the existing Northern Powergrid assets in this location involve an existing undergrounded section of electric cables that runs broadly in an easterly direction from this wooden pole).

6.1.37. The construction compound on the northern side of Rawcliffe Road is assumed to be located at least 20m to the west of the existing wooden poles to avoid working areas near the existing overhead lines and the anticipated location of the existing undergrounded electricity cables. A Trenchless Construction method is proposed under Rawcliffe Road, between the two construction compounds, running broadly perpendicular to the highway.

6.1.38. The proposed works include the removal of both wooden poles within the land to the north of Rawcliffe Road because all electrical cables will be undergrounded due to the

proposed works. All undergrounding outside the boundary of highway land to the north of Rawcliffe Road will be undertaken through an open cutting technique.

6.1.39. Access to the works area to the north of Rawcliffe Road is proposed via Elite Road, and the existing access into the field, and it is assumed that an access of 5m width is suitable for all construction traffic.

6.1.40. The construction compound on the southern side of Rawcliffe Road will be located within agricultural land and accessed via an existing field access from Rawcliffe Road. It is assumed that the electric cables will be undergrounded under Rawcliffe Road, and then connect to the existing pole on the southern side of Rawcliffe Road either via an underground cable to be installed via an open trench method, or via the installation of a new wooden pole and the provision of a new section of overhead line between the new pole and the next pole to the east, and a corridor of land is included to accommodate this additional undergrounded section. Additional restringing may be required to the next wooden pole to the east and a 10m wide corridor of land is included within proposed extension to the Order Limits to enable this restringing to be undertaken.

6.1.41. If an alternative trenchless installation method is potentially appropriate in this location, it is anticipated the compounds would be in the same location as those described above for the HDD works.

6.1.42. If an Open Cut installation method is identified as potentially appropriate for this location, the area of land affected by proposed works may be reduced because it is likely that smaller compound areas (smaller than those identified for HDD works) would be required either side of Rawcliffe Road.

6.1.43. Works will be designed to minimise the area of land affected by the temporary works, and to install new below and above ground electrical infrastructure in locations which minimise impact on land which may have future potential for accommodating built development. Detailed designs and cost estimates have been requested from the asset owners taking into account comments received from interested parties (see Appendix 8 – document reference 8.5.3.8). See further details in the Statement of Reasons (Appendix 14 (document reference 8.5.3.14)).

6.1.44. Temporary possession powers will be sought as part of the DCO for the realignment and trenchless or trenched installation works, as appropriate.

6.1.45. New permanent rights for the benefit of the asset owner will be sought as part of the DCO for the retention, maintenance, repair or replacement of the asset along any altered alignment route (be that an altered overhead line or a new undergrounded section).

6.1.46. Where the proposed works will utilise existing accesses to properties, it is proposed that if any damage is caused to existing accesses arising from the works, that appropriate repairs are undertaken to maintain the condition of the access road/track to the same as it was prior to the commencement of works. This will be added as an

additional measure to the REAC (AS-027) as shown in Ref ID PH4 in Table 6-2 below.

6.1.47. Any land and habitat on which temporary works take place would be reinstated to its original condition on completion of the works, as is required by the DCO temporary possession article. As set out in REAC item E17 works will be carried out in accordance with the recommendations contained on Figure 4 (OHL Landscape and Biodiversity Plan) (document reference 8.5.3.4).

TCL1

6.1.48. For **TCL1** (Openreach asset), works will comprise one undergrounded route via trenchless or trenched installation methods between the pole on the southern side of Rawcliffe Road to a point opposite within the agricultural field to the north of Rawcliffe Road. A new telecommunications pole is proposed at the northern end of the HDD compound (if this trenchless installation method is appropriate), which will allow the connection of the existing telecommunications cables to the west of this point to the pole/underground telecommunications assets to the south of Rawcliffe Road (via the undergrounded cables via HDD). It is also proposed that a new overhead telecommunications cable would link the new pole to the existing pole at the southwest corner of Woodside Café.

6.1.49. Access and the temporary works area to the north of Rawcliffe Road will be via an existing access track at the western end of the proposed works. A corridor of at least 20m wide is proposed, which will include the HDD compound and suitable access to enable the installation of a new telecommunications pole and the cable stringing works. All works would be undertaken within the agricultural land to the west of Woodside Café. Access to the existing pole at the south-western corner of Woodside Café is included to accommodate restringing works to the new pole to the west, and the removal of existing overhead telecomunications lines over Rawcliffe Road.

6.1.50. Access and the temporary works area to the south of Rawcliffe Road will be via an existing field access. Land is included within the updated Order Limits to accommodate the HDD compound (assuming that the larger driving compound could be located either on the north or south sides of Rawcliffe Road) and suitable access to the HDD compound and to the existing telecommunications pole on the southern side of Rawcliffe Road to allow for the removal of the existing overhead telecommunications cables.

6.1.51. If an alternative trenchless installation method is appropriate, the compounds would be in the same location as those described above for the HDD works.

6.1.52. If a trenched installation method is appropriate, it is likely that smaller compound areas (smaller than those identified for HDD works) would be required either side of Rawcliffe Road.

6.1.53. Temporary possession powers will be sought as part of the DCO for the realignment and HDD works, as appropriate.

6.1.54. New permanent rights for the benefit of the asset owner will be sought as part of the DCO for the retention, maintenance, repair or replacement of the asset along any altered alignment route (be that an altered telecommunications OHL or a new undergrounded section).

6.1.55. Where the proposed works will utilise existing accesses to properties, the access road or track will be left in the condition it was prior to the commencement of works. This will be added as an additional measure to the REAC (AS-027) as shown in Ref ID PH4 in Table 6-2 below.

6.1.56. As shown in Plate 6-2, access would also be provided into the compounds.

6.1.57. As set out in REAC Ref ID E17 works will be carried out in accordance with the recommendations contained on Figure 4 (OHL Landscape and Biodiversity Plan) (document reference 8.5.3.4).

PROPOSED TIMESCALES

6.1.58. For the works, regardless of construction method, it is expected that they will take 10 days and that there will be a one-week overlap period for each of the Lines, so the total works duration is anticipated to be approximately four weeks.

6.2. SUMMARY OF THE ENVIRONMENTAL APPRAISAL

6.2.1. The potential environmental implications of PC-02 have been reviewed and assessed. The purpose was to identify if the changes would result in any new or different likely significant environmental effects compared to those recorded in the technical chapters of the ES. Environmental impacts during operation and decommissioning have not been considered as it is anticipated that during operation the undergrounded lines would be left in situ or otherwise subject to standard sporadic utility maintenance activities and they would not be decommissioned as part of the Proposed Scheme. As such only impacts during the construction phase have been assessed.

6.2.2. PC-02 is the relocation of existing overhead lines which cross the access route to the Site at A614 (Rawcliffe Road) and the A645, to allow for the delivery of AILs to the Site. This Proposed Change involves land that is outside of the current Order Limits and is not in the ownership of the Applicant.

6.2.3. Table 6.1 below presents the outcome of the environmental appraisal of PC-02.

Table 6-1 - Environmental Appraisal for PC-02

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 5: Transport	The proposed undergrounding of the lines is not anticipated to result in any new or different significant effects during construction compared to those contained in the Chapter 5 (Traffic and Transport) (APP-041) of the ES. During the construction phase, vehicular access to each of the construction compounds will be from existing vehicular accesses formed with the public highway. Temporary modifications may be required to widen one or more of the accesses to ensure safe and suitable temporary construction access for the duration of the works. The construction compounds also include sufficient space to enable vehicles to enter and exit each work area in a forward gear. Measures will be implemented to prevent mud deposition on the public highway as construction vehicles exit the construction compounds. Vehicle movements (light duty vehicles (LDV) and heavy duty vehicles (HDV)) during the construction phase will remain within the levels assessed in the ES by programming the works outside the peak construction periods, which will be secured through the Outline Construction Traffic Management Plan (OD-009). Trenchless Construction methods will be utilised for the undergrounding of OHL 1 to minimise impacts to road users. The use of Trenchless Construction methods under the carriageway would eliminate the need for road closures, reduce the amount of spoil displacement, and minimises impacts to all users of the highway. The Open Cut Construction method for OHL 2 and TCL1 would be more disruptive than Trenchless Construction methods due to additional traffic management requirements. A partial road closure with a traffic management system in place to enable single line traffic, or a full road closure with a traffic management system in place to divert traffic may be required. Works requiring full road closures would typically take place at night to minimise the impact on traffic – this commitment will be added to the Outline CTMP. Short duration, temporary traffic management e.g. traffic lights may also be required when the OHLs and telecommunications line are disconnected. This would have a short duration impact and increase	The change would not result in any new or significant different effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	driver delay, but these works would be programmed to avoid peak periods where possible – this commitment will be added to the Outline CTMP. With these measures in place, it is anticipated any temporary change in LDV and HDV vehicle movements (or delay to them) on the highway network as a result of the proposed undergrounding of the Lines, whichever method is utilised. There would therefore be no change to the conclusions of the ES. A footway which runs to the north of the A614 and to the west of the A614 / Airmyn Road roundabout, and an adjacent bus stop on the A614 may be affected during the construction phase. A separate footway that runs to the north of the A614 to the east of the A614 / A645 roundabout may also be affected during the construction phase. Short duration, temporary diverted footways may be required during the construction phase. This would have a short duration impact on pedestrian delay, pedestrian amenity and fear and intimidation. However, the short length and short duration of diversions are not considered to result in a significant effect. A PRoW (AIRMF03) runs east west to the north of the OHL1 and may be affected during the construction phase at the point where PROW (AIRMF03) crosses the A645. Short duration, temporary diversion to PROW (AIRMF03) may be required during the construction phase at this location. This will have a short duration impact on pedestrian delay, pedestrian amenity and fear and intimidation. However, the short length and short duration of diversions are not considered to result in a significant effect. The short length and duration and small number of traffic movements associated with the proposed undergrounding of the lines means the significance of effects of severance, pedestrian amenity, fear and intimidation, highway safety, and driver delay during the construction phase would not change from that originally assessed.	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Chapter 6: Air Quality	Whilst activities associated with the OHL works; particularly Open Cut Construction trenching and excavating, have the potential to generate fugitive dust emissions during construction, the activities would be subject to the mitigation measures detailed in the REAC (AS-027) which would ensure there would not be significant effects on any nearby receptors during construction. Given these works would take place during the construction phase, there would be no change to the air quality impacts reported for the operation phase. Overall it is not anticipated that there would be any new or different significant effects in relation to air quality during construction or operation.	The change would not result in any new or different significant effects from those described in the ES.
Chapter 7: Noise and Vibration	The nearest noise sensitive receptors are approximately 70m south east of the proposed areas for Trenchless Construction methods and open cutting and filling at OHL1. Works are proposed approximately 50m from the Woodside Cafe for TCL1. Options for both Open Cut and Trenchless Construction methods have been considered. Noise predictions have been undertaken assuming a worst-case noise level of 85dB at 10m from Trenchless Construction activities and 76dB at 10m from Open Cut Construction activities. The predicted noise levels due to works associated with OHL1 may exceed the Significant Observed Adverse Effect Level (SOAEL) at the nearest sensitive receptors with a magnitude of impact of moderate adverse for short periods of time. However, the duration of the activities will not be longer than 10 days, with the duration of noisy works anticipated to be less and therefore, the effects are not significant in accordance with Paragraph 7.5.60 of Chapter 7 (Noise and Vibration) (APP-043) of the ES.	The change would not result in any new or significant different effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	For works associated with OHL2, Open Cut and Trenchless Construction options have also been considered for the hotel approximately 290 m from the works. Noise levels due to works associated with OHL2 will not exceed the SOAEL at the nearest sensitive receptor. Vibration levels at the nearest receptors as a result of the works are not expected to exceed the SOAEL. For each of OHL1, OHL2 and TCL1 it is assumed that works will be undertaken using Best Practicable Means (BPM) including temporary noise screens, where practicable for both the Trenchless Construction and Open Cut areas as well as the construction compounds. It is therefore not anticipated that there would be any new or different significant effects during construction or operation.	
Chapter 8: Ecology	A habitat survey was undertaken for the OHL1 and TCL1 works areas (off Rawcliffe Road) in November 2022. Both areas were made up primarily of agricultural land, grasslands and hardstanding urban features such as roads and pavements. Other habitats such as scrub, woodland, hedgerow, dry ditch and a standing water ditch were also recorded. The woodland, scrub and hedgerow habitats provided suitability for common and widespread breeding birds and commuting and foraging bats. Scrub and woodland edges identified in the west of the proposed Order Limits also provided suitable refuge opportunities for reptiles. The landscape is open with habitat cover restricted to the western area. Results of the habitat survey are summarised in Appendix 4 (Ecology Survey Technical Note) (document reference: 8.5.3.4). Given the very limited spatial extent of the works, (see Section 6.1 for a description of PC-02) impacts that could trigger effects on ecological receptors are not considered to be materially different between Open Cut Construction and Trenchless Construction methods. Although the areas identified for PC-02 would be primarily located within agricultural or improved grassland (habitats that often comprise low biodiversity value and offer limited suitability to wildlife), there is likely to be some vegetation removal of grassland edges. A native, species-rich hedgerow was	The change would not result in any new or significant different effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	recorded as part of the habitat survey which is considered to be a Habitat of Principal Importance (HPI). No other HPI was recorded during the habitat survey. The areas comprising the OHL and TCL Order Limits are not in proximity to any statutory or non-statutory designated sites, nor are there evident impact pathways connecting the areas where construction works would take place with such protected sites, that are predicted to give rise to likely significant effects. The OHL locations are adjacent to an existing main road and public footpaths, with residential and commercial properties present. As such, they are unlikely to provide functionally-linked land for any European Site species. As a result, the conclusion made in the Habitats Regulations Assessment (APP-185) remains unchanged. No additional EPS licences are expected to be necessary, as the habitats present have limited suitability to support European Protected Species such as roosting bats or great crested newts. Any habitat modification and associated construction activities, particularly in proximity to woodland parcels and ditches, could lead to the disturbance of protected and notable species (primarily breeding birds and mammals) and potential short-term loss of their habitats. Site clearance is to take place outside of the breeding bird season (where practicable) as outlined in Ref ID E5 of the REAC (AS-027). Where not possible, checks would be completed by an ecologist and mitigation employed as needed, also as specified in Ref ID E5 REAC (AS-027) and would be secured through the CEMP. It is assumed that grassland verge habitats, arable land and ditch habitats could be temporarily removed or modified to facilitate the construction compounds. Given the small-scale nature of the works and that they are primarily confined to grassland, agricultural land and urban features they would lead to a short-term loss of habitat which would be negative although not significant. All semi-natural habitats modified as part of PC-02 would be reinstated following construction to their original condition. These measures would be included and secured within an updated Outline Landscape and Biodiversity Strategy which is a DCO requirement. It is anticipated that no HPI would be impacted, with the identified hedgerow to be retained during the works. Given the	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	timescale of the works is expected to be a maximum of four weeks in duration, and the localised nature of the activities, the effects of construction would be neutral in the medium-long term. As a result there would be no change to the significance of effects as presented in ES Chapter 8 (Ecology) (APP-044) and there would not be any new significant effects. If PC-02 is accepted into Examination, the Applicant will update the BNG Assessment (APP-196) to account for these proposals.	
Chapter 9: Landscape and Visual	Although PC-02 represents a physical change to the existing situation, in terms of landscape and visual effects, the proposals result in a non-material change and effects that are determined to be not significant. The land affected would be reinstated to the pre-existing condition. The sections of the Lines that currently cross over the A645 and A614 would be undergrounded, resulting in a negligible beneficial effect, following construction. At the existing crossing point of the A614, the southern Pole would be removed and a new Pole would be erected opposite it, on the northern side of the road, resulting in a negligible effect. At the existing crossing point of the A645, the western pole would be de-strung and retained in situ, as it is located within the linear belt of trees and shrubs at the side of the road, and it would effectively become part of the linear belt of trees and shrubs from both a landscape and visual perspective. To facilitate the undergrounding of the cables there may be a requirement to remove some vegetation but this would be reinstated. A new pole would be erected opposite it, on the eastern side of the road. Overall, this would result in a negligible effect. As result it is not anticipated that there would be any new or different significant effects during construction or operation.	The change would not result in any new or significant different effects from those described in the ES.
Chapter 10: Heritage	A review of online data shows that there are no designated heritage assets within the Order Limits of PC-02 and within a 500 m study area. Based on available historic mapping the proposed construction compounds have been used for agricultural purposes since at least the 1880s through to the present	The change would not result in

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	day. Due to this, the proposed construction compounds have potential for hitherto unknown buried archaeological remains to be located, although this is relatively low. As Trenchless Construction methods are minimally intrusive and the potential for archaeological remains is low it is not anticipated that there would be any significant effects on archaeological remains. It is not anticipated that Open Cut Construction across highways would have significant effect on unknown buried archaeological remains due to previous truncation / removal during the construction of the road. Any Open Cut Construction outside the highway area is considered to be relatively localised and therefore no significant effects on archaeological remains are anticipated. No further mitigation is therefore recommended, however this would be agreed with the Local Planning Authority before construction commences as part of the discharge of Requirement 13 of the DCO for these works. It is therefore not anticipated that there would be any new or different significant effects during construction as a result of PC-02.	any new or significant different effects from those described in the ES.
Chapter 11: Ground Conditions	<u>Human Health and Controlled Water Receptors</u> Baseline information has been gathered which has informed a Preliminary Risk Assessment (PRA) (refer to Appendices 2 and 3 (document references 8.5.3.2 and 8.5.3.3)). Due to the limited nature of this infrastructure work and the findings of the PRA a ground investigation is not considered to be necessary. Measures to manage environmental risks should unexpected contamination be encountered during the works would be managed effectively through local measures set out in the CEMP. Therefore PC-02 is not anticipated to create any new or additional significant adverse effects. <u>Agricultural Soils and Soil Function</u>	The change would not result in any new or significant different effects from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	A614 Rawcliffe Road / Airmyn Road roundabout is mapped as ALC Grade 2 (BMV) based upon post-1988 ALC. The estimated area of potentially impacted Grade 2 ALC land is 1600 m^2. A645 / A614 Rawcliffe Road roundabout is mapped as Provisional ALC Grade 2 (BMV). The estimated area of potentially impacted Grade 2 ALC land is 3,250 m^2. The total estimated area of BMV agricultural soils which may be impacted by the proposed works is 4,850 m^2 (approximately 0.5ha). Works are short term and temporary (estimated at 10 days of work per line) with the land proposed to remain in agricultural use with no loss of BMV. A Soil Handling Management Plan would be produced (as already committed to in Ref ID GC2 in the REAC (AS-027)) which would detail clear guidance on the methods of recovering, storing and reinstating the soils whilst minimising a loss in quality and function during construction. Open Cut Construction activities may result in the potential for adverse impacts on soils however these works along with new access roads and compounds required for construction would be temporary and the area would be reinstated once works are completed in line with the Soil Handling Management Plan. Where Trenchless Construction methods are used, impacts to agricultural soils would be reduced. Therefore it is not anticipated that there would be any new or significant effects on agricultural soils or soil function as a result of PC-02.	
Chapter 12: Water Environment	<u>Surface Water</u> During construction the works are not expected to impact the quality or quantity of the nearby watercourses (under jurisdiction of Goole and Airmyn IDB) during construction as a result of Trenchless Construction methods, removal of Poles and access requirements. The works would not involve impacting watercourses (the Trenchless Construction may in some instances be below a minor drainage ditch), only the southern construction compound of the TCLs would require crossing a minor watercourse, which would be undertaken using a temporary bridge (e.g. Bailey Bridge) to avoid adverse impacts, with the bridge removed and the landings / ditch restored as required on completion of the	The change would not result in any new or different significant effects

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	works. This new measure is included in Table 6.2 with Ref ID WE19. Given the proximity of some of the Trenchless Construction works to watercourses, drilling fluids which are approved to discharge to the water environment would be used, to prevent adverse impacts should they be accidently released to the water environment. Under normal operating circumstances, they would be appropriately captured, stored and treated / disposed offsite in accordance with best practice and the REAC. An additional measure would also be added to the REAC (AS-027), as described in Ref ID WE16 in Table 6.2 below. Open Cut Construction activities may result in the potential for adverse impacts on the quality of nearby watercourses as in one instance, the open cut trench would be through a minor field drain. However, these impacts would be managed and mitigated through the mitigation measures described in the REAC and an additional measure would also be added to the REAC as described in Ref ID WE18 Table 6.2 below. With these mitigation measures in place, the works would not result in significant effects. New access roads and compounds required for construction would be temporary and the area would be reinstated once works are completed. It is assumed that construction compounds and new access roads would not be hard surfaced so no increase in runoff is envisaged. A new measure to this effect would be added to the REAC (AS-027) as described in Ref ID WE17 in Table 6.2 below. Additionally, the risk of potential impacts to surface water would be managed through the adaptation of best practice and the measures detailed in the REAC (AS-027) and it is therefore not anticipated that there would be any new or significant effects on surface water as a result of PC-02. <u>Groundwater</u> *Trenchless Construction Methods* The exit and entry pits are expected to be very shallow (< 1 mBGL) and are not expected to intercept groundwater (approximately 5-6 mBGL according to local historic borehole records (BGS GeoIndex)); furthermore no dewatering is anticipated. The western proposed trenchless crossing is within a	from those described in the ES.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	groundwater Source Protection Zone (SPZ) 3. During Trenchless Construction works, drilling fluid losses to groundwater can occur in high permeability ground materials. Where these conditions are to be encountered the drilling contractors would need to monitor the fluid pressures and observe for pressure drops as detailed in ID Ref WE16 in Table 6.2 below which would be added to the REAC. The superficial deposit Secondary A aquifer is more sensitive than at the Drax Power Station Site (non-aquifer), and there may be additional receptors such as private groundwater abstractions present, however no confirmation of this has been received. The risks associated with Trenchless Construction methods (minus drilling fluid risks) and Pole removal works, such as accidental spillage of fuel, oils and chemicals and increased turbidity of groundwater, would be mitigated by standard pollution-prevention measures as already detailed in the REAC (AS-027) (Ref. ID WE8). It is therefore not anticipated that there would be any new or different significant effects during construction as a result of PC-02. *Open Cut Construction* The superficial geology at the proposed excavation locations is alluvium, comprised of clay, silt, sand, and gravel. This is classified as a secondary A aquifer according to the Environment Agency and considered to be a medium sensitivity receptor. This overlies a principal aquifer which is the Sherwood Sandstone Group, which is comprised of sandstone (high sensitivity according to DMRB LA 113) and considered a high sensitivity receptor. The aquifers of the alluvium and are expected to be in hydraulic continuity with each other. There are no groundwater Source Protection Zones present, the nearest (SPZ 3) is approximately 1.1 km to the west. A search of local borehole records (BGS GeoIndex) determined that the groundwater level in the vicinity of the open cut trench at OHL 2 and TCL1 is likely to be shallow (~0.35 mbgl). Therefore, as the proposed base of the trench is below the expected groundwater level, groundwater inflow into the trench during construction works is expected.	

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	Trench dewatering is likely to be required, which will cause a suppression in the water table in the vicinity of the trench. As the expected drawdown is minor (approximately 0.65 m), the radius of influence (ROI) would not be expected to extend very far from the trench. Also, any dewatering would be very short duration, only necessary whilst the trench remains open. Therefore, any quantitative impact which does occur is expected to be very short duration and minor and therefore not significant. Any water pumped out of the trench during dewatering works would be expected to be very high in turbidity and should be settled out prior to disposal to surface water (to be included as a new measure in the REAC, Ref ID WE20). There would also be an increase in turbidity in the alluvium secondary A aquifer. However due to the nature of the groundwater flow within the aquifer being primarily intergranular, no significant effect is expected. As the alluvium secondary A aquifer groundwater level is very close to ground surface and would be exposed during the proposed works, it would have no protection from surface pollutants which could be introduced during the works. These could be leaks or spillages of fuels, oils, lubricants, hydraulic fluids or any pollutant used by plant machinery or vehicles. This risk also extends to groundwater abstractions to the northwest and north northwest. Good practice measures as detailed in the REAC (AS-027) (Ref ID WE-08) including the provision of oil spill clean-up equipment, use of drip trays, refuelling protocols and appropriate management of construction materials including cement and concrete would mitigate this risk. With this mitigation in place, no significant effects are expected.	
Chapter 13: Materials and Waste	PC-02 comprises undergrounding of existing electricity and telecommunications lines by Trenchless Construction and Open Cut Construction methods. Drilling fluid will be used to assist soil excavation and removal, with the resulting slurry pumped out of the borehole.	The change would not result in any new or

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	It is anticipated that only a small volume of road surfacing, paving, Trenchless Construction slurry arisings, and cabling and associated ducting, would be generated from these work activities. Two Poles would also need to be replaced. It should be noted that given the likely make up of the slurry (predominantly water), the planned approach would be to (wherever practical) tanker liquid off site (using minimal traffic movements) for management (e.g. treatment, such as de-watering) and / or disposal; or (where safe and legal) deposit the slurry within the boundary of the existing Drax Power Station Site. Once quantities and other details of the slurry are known, a further determination will be made of whether the tankering and / or on-site deposition approaches are viable. However, the volume of solid arisings that *could* be disposed of (adopting a worst case scenario) is not – using professional judgement – expected to materially change the findings of the assessment. Impacts are anticipated to be negligible in the context of regional landfill capacity (as discussed in the ES) and would be managed effectively through local measures set out in the CEMP. Overall, it is not anticipated that these sources of arisings would give rise to any new or different significant effects during the construction phase of the scheme. Similarly, these arisings would not be expected to cause any impacts during operation, and hence no new or different significant effects are forecast for this lifecycle stage.	significant different effects from those described in the ES.
Chapter 14: Climate Resilience	Based on the assumption that the cable installation would incorporate adequate protection from ground movement / subsidence, PC-02 is not anticipated to result in any new or different significant effects.	The change would not result in any new or different significant

Topic	Environmental Appraisal of the Change	Change to Significant Effects
		effects from those described in the ES.
Chapter 15: Greenhouse Gases	PC-02 requires additional construction works comprising Trenchless Construction or Open Cut Construction, temporary construction compounds, cabling and ductwork, transportation and use of construction equipment. These would be in addition to the construction phase emissions calculated in Chapter 15 (Greenhouse Gases) of the ES (APP-051), which stated a total of 104,700 tCO_2e and was considered to result in a moderate, significant adverse effect. The works for PC-02 are anticipated to only marginally increase the calculated construction emissions (as quantities of construction materials are unconfirmed at this stage, a quantitative assessment is not possible). Furthermore, in context of the net GHG emissions for the Proposed Scheme (-7,972,111 tCO_2e/year), the additional construction works for the OHL are not anticipated to result in any new or different significant effects in relation to greenhouse gases. The mitigation measures outline in the ES for the construction phase remain valid and appropriate to the additional OHL works.	The change would not result in any new or significant different effects from those described in the ES.
Chapter 16: Population, Human Health and Socioeconomics	The works for OHL1 and OHL2 take place on the perimeter of agricultural land, and the works for TCL1 take place within existing agricultural land used for arable farming. However, given access for arable use is likely to be infrequent (on a monthly basis), no farming activities would be restricted. Furthermore, the existing accesses to properties and land would be maintained or reinstated to their current condition, so it is not anticipated there would be any new of different significant effects. For TCL1, works would take place within existing agricultural land used for arable farming. Whilst the area of use is slightly bigger, there is a limited area of agricultural use which could be affected by the works. Frequency of access for arable use is likely to be infrequent (on a monthly basis) and therefore no farming activities would be restricted during the approximate 10 day construction duration. Access	The change would not result in any new or significant different effects from those

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	and the temporary works area will be via an existing field access. This will be added as an additional measure to the REAC (AS-027) as shown in Ref ID PH3 in Table 6.2 below. For all works, where construction vehicles require access via existing accesses to properties and land, it is proposed that if any damage is caused to existing accesses arising from the works, that appropriate repairs are undertaken to maintain the condition of the access road/track to the same as it was prior to the commencement of works. This would be added as a new measure to the REAC (AS-027), as shown in Ref ID PH4 in Table 6.2 below. Permanent rights within agricultural land for both the OHLs and TCL1 for the purposes of retention, maintenance, repair or replacement would be minimal and represent a similar portion of land to that occupied by existing Poles. It is not anticipated to restrict farming activities within the agricultural land holdings, or give rise to any permanent effects for the farm businesses. A PRoW (AIRMF03) runs east west to the north of OHL1. As the PRoW could overlap with one of the OHL construction access points where it crosses the A645, there may be temporary impacts on footpath users. Short duration, temporary diversion to PRoW (AIRMF03) may be required during the construction phase at this location which would have a short term impact on pedestrian delay and pedestrian amenity. The short length and short duration of diversions are not considered to give rise to a significant effect. It is therefore not anticipated that there would be any new or different significant effects during construction. The site boundary for Short List ID44 (see Appendix 18.2 (Short List of Other Developments) (AS-013)) overlaps with the proposed Order Limits for OHL2. Although Short List ID 44 is an employment development, it does not fall within an employment development allocation as per the East Riding of Yorkshire Local Plan (2016). Due to this, and because of the nature of PC-02, it is not anticipated that there will be any significant effects on allocated development land.	described in the ES.
Chapter 17: Major	The assessment of the vulnerability of the Proposed Scheme to a major accident and / or disaster (MA&D) during the construction and operation phases determined that the risk associated with	The change

Topic	Environmental Appraisal of the Change	Change to Significant Effects
Accidents and Disasters	electricity was managed to be as low as reasonably practicable (ALARP) with the mitigation measures proposed in the DCO Application. It is unlikely that these works would increase the vulnerability of the Proposed Scheme to a Major Accident and / or Disaster. This is based on the assumption that the works will be undertaken by the statutory undertaker or undertaken by the Applicant following ways of working and risk assessments agreed with the statutory undertaker. In addition, the PC-02 does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline. There would therefore be no change to the outcome of the major accidents and disasters assessment during construction or operation.	would not result in any new or significant different effects from those described in the ES.
Chapter 18: Cumulative Effects	As detailed in the environmental appraisal for each environmental topic above it is not anticipated that PC-02 would result in any new or different significant effects from those described in the ES. Therefore, it is considered that PC-02 would not result in any additional intra-project cumulative impacts from those presented in Chapter 18 (Cumulative Effects) (APP-054) of the ES, either in relation to the Proposed Scheme as a whole, nor in considering Proposed Change PC-02 on its own. There would therefore be no changes to the outcome of the assessment presented in Chapter 18 (Cumulative Effects) (APP-054). Due to the size and nature of PC-02, it is not anticipated that there would be any other inter-project combined effects with the developments included within Appendix 18.2 (Short List of Other Developments) (AS-013) or that there will be any further interactions with other developments not listed in Appendix 18.2 (AS-013). On this basis, the findings of Chapter 18 (Cumulative Effects) of the ES remain as reported. It should be noted, however, that the site boundary for Short List ID44 (a new employment development with landscaping and infrastructure) overlaps with the proposed Order Limits for OHL2. At the time of writing, the Planning Committee resolved to defer and delegate the approval of Short List ID44 and it is	No new or significant different effects from those described in the ES are anticipated.

Topic	Environmental Appraisal of the Change	Change to Significant Effects
	understood that the council and the applicant are working towards the issuing of the decision notice. The timescales of the development are therefore unknown. The design of PC-02 has therefore developed to seek to minimise impacts to that development site as much as is possible at this stage, which has led to the consideration of the range of Open Cut and Trenchless Construction techniques that could be used. What is presented in this PCAR is considered to be the reasonable worst case for environmental impacts and impacts upon that development site. However, the Applicant is committed to continuing to discuss the detailed design of these works with the landowner in relation to the OHL2 works, alongside on-going discussions with the asset owner Northern Powergrid. This is a new commitment that will be added to the REAC as Ref ID G21, to be followed through into the CEMP.	

6.2.4. On the basis of the above assessment undertaken for PC-02 a number of mitigation measures would be required in addition to those already set out in the REAC as submitted (AS-027). These suggested additions are set out in **Table 6-2** below. If PC-02 is accepted into Examination, the REAC would be updated accordingly.

Table 6-2 - Register of Environmental Actions and Commitments - Suggested Additions in Relation to PC-02

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
G20	A trenchless solution will be used for Work No. 8A (for the section where it oversails the carriageway and for the existing landscaping belt to the west of the A645 at	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA.	Main Contractor

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
	'Tanglewood'. This will avoid impact of the works on the carriageway and established vegetation.					
G21	The Applicant will commit to continuing discussions on the detailed design of the works to take place as part of 22/01930/STPLF with the landowner, in relation to the OHL2 works, alongside ongoing discussions with the asset owner Northern Powergrid.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA.	Main Contractor
To be included as part of T1	The working areas for Work No. 8 will include sufficient space to enable vehicles to enter and exit each work area in a forward gear.	Proposed Change Application Report	Construction	DCO Requirement	The CTMP will be approved by the LPA.	Main Contractor
T4	Work Nos. 7 and 8 will be programmed outside the peak construction periods.	Proposed Change Application Report	Construction	DCO Requirement	The CTMP will be approved by the LPA.	Main Contractor

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
E16	All natural habitats modified as part of Work No. 8 would be reinstated following construction to their pre-existing condition, these measures will be included within the Outline Landscape and Biodiversity Strategy.	Proposed Change Application Report	Operation	DCO Requirement	Landscape mitigation, planting and design will be carried out in line with the LBS, which will be developed in accordance with the OLBS, to be approved by the LPA following consultation with NYCC.	Main Contractor
E17	Work No. 8 will be carried out in accordance with the recommendations contained on Figure 4 of the Proposed Changes Application Report submitted during Examination.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
H7	No further mitigation for Historic Assets is recommended for Work No. 8, but this will be agreed with the Local Planning Authority before construction commences.	Proposed Change Application Report	Pre-construction Construction	DCO Requirement	WSI approved by the LPA in consultation with the local authority.	Main Contractor The Applicant

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
WE16	For Trenchless Construction works that may be necessary for Work No. 8, the drilling contractors will monitor the drilling fluid pressures and observe for pressure drops. A drilling fluid that is approved to discharge to the water environment will be used.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
WE17	For Work No. 8, construction compounds and new access roads will not be hard surfaced so that runoff is not increased.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
WE18	Where Open Cut Construction is required through a watercourse the following measures will be implemented: b. Channel and banks will be reinstated to mimic baseline conditions as far as practicable; c. Where practicable, any habitats that have been	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA and EA	Main Contractor

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
	removed will be reinstated; d. Any watercourses interrupted during excavation would be temporarily diverted or serviced with pumps to bypass the excavated section; e. Vegetation reinstatement on open cut crossings would include riparian planting with enhancements to the riparian zone in line with the **Outline Landscape and Biodiversity Strategy (OLBS)** where practicable; f. Where required and appropriate, bio-textile matting would be used to stabilise the banks of the watercourse whilst vegetation established post construction; and g. A minimal working width would be adopted as far as practicable to minimise the potential impacts of open cut crossings.					

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
WE19	The southern construction compound of TCL1 will require cross a minor watercourse, which will be undertaken using a temporary bridge. The bridge will be removed and the landings / ditch restored as required on completion of the works.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
WE20	During trench excavation works should dewatering be required due to groundwater inflow any water which is pumped out to be discharged to a nearby surface water course will undergo settlement treatment for reducing turbidity prior to being discharged	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
WE21	The contractor shall ensure that any existing land drainage system existent in and around Work No. 8 is not compromised as a result of construction. Such land	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA and EA	Main Contractor

Ref ID	Mitigation measure	Source Ref.	Project Stage	Mechanism for Securing Measure	Achievement Criteria and Reporting Requirements	Responsible Organisation
	drainage systems will be maintained during construction and reinstated so far as reasonably practicable to a condition that is as effective as the previous condition on completion. Any temporary drainage to be installed during the carrying out of Work No. 8 shall maintain the integrity of the existing field drainage system during construction.					
PH3	There will be on-going liaison with owners and/or operators of agricultural land holdings to coordinate access requirements.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor
PH4	The existing accesses to properties and land would be maintained or reinstated to their current condition. If any damage is caused to existing accesses arising from the works, appropriate repairs will be undertaken.	Proposed Change Application Report	Construction	DCO Requirement	The CEMP will be approved by the LPA	Main Contractor

6.3. ANY REQUIRED AMENDMENTS TO DCO DOCUMENTATION

6.3.1. **Table 6-3** details the amendments to Application documents that would be required because of PC-02 and sets out:

(a) for the documents not submitted pursuant to the requirement of Regulation 5 of the CA Regulations, where extracts showing the relevant changes can be found (either in the appendices to this Proposed Changes Application); and

(b) for the documents submitted pursuant to the requirements of Regulation 5 of the CA Regulations, the appendix number of those documents. It should be noted that the changes in the Book of Reference have been colour coded in the clean version of the document to differentiate between the changes required as a result of PC- (in blue) as opposed to PC-02 (in green in relation to the CA Additional Land, and in red for the temporary possession plots).

6.3.2. If PC-02 is accepted into Examination, the Applicant would as soon as possible thereafter submit fully updated versions of the documentation in clean and track changed form.

Table 6-3 - Amendments to Application Documents as a Consequence of PC-02

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
1.4	AS-024	Application Tracker	Addition of documents associated with PC-02	To be issued if Proposed Change is accepted
1.7	APP-007	Glossary	Addition of new terms and definitions associated with PC-02	To be issued if Proposed Change is accepted
2.2	APP-009	Land Plans	To include additional land required to provide PC-02, including an update to the Key Plan; and two new Sheets (3 and 4) to incorporate adjusted Order Limits for PC-02.	These changes shown in the updated Land

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
			As the works are taking place outside of the Applicant's land, land powers are sought in line with CA Regulations requirements. These Land Plans include both plots that require additional compulsory acquisition of rights and easements plots (i.e. the CA Additional Land, which invokes the CA Regulations) and temporary possession plots (which do not invoke the CA Regulations), for ease of presentation.	Plans submitted as Appendix 9 (document reference 8.5.3.9). These plans will be formally submitted as an updated revision of APP-009 if PC-02 is accepted for consideration.
2.3	OD-005	Works Plans	To add details for PC-02 including updates to Key Plan and new Work Nos 8A and 8B for PC-02 (both shown on new Sheet 18).	The changed sheets have been extracted and appended as Appendix 10 (document reference 8.5.3.10). An update to the full plan set incorporating these changes will be formally

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
				submitted if PC-02 is accepted for consideration.
2.4	APP-011	Access and Rights of Way Plans	Update of Key Plans and Sheets 4 and 5 to include revised Order Limits for PC-02.	The changed sheets (alongside those sheets required to change for PC-01) have been extracted and appended as Appendix 11 (document reference 8.5.3.11). An update to the full plan set incorporating these changes will be formally submitted if PC-01 is accepted for consideration

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
3.1	AS-026	Draft Development Consent Order	Changes to Schedules 1, 5, 7, 8 and 10. As a result of the changes amends are also required to articles 10, 11 and 13 of the DCO. As the additional land required for PC-02 involves Crown Land (as discussed in the Statement of Reasons at Appendix 12 (document reference 8.5.3.12)), if the Proposed Change is accepted, the DCO will need to be updated to include a 'Crown Rights' article in a form similar to that found in a number of made DCOs, such as most recently on the A428 Black Cat to Caxton Gibbett project. The Applicant is also considering whether article 6 (benefit of the Order) and article 20(5) of the draft DCO for the Proposed Scheme will need to be updated to facilitate the delivery of new Work No.8 (to carry out the PC-02 changes) being able to be undertaken by Northern Powergrid and BT Openreach in respect of their assets (and the ability to acquire the necessary rights). This would be updated if change PC-02 is accepted by the Examining Authority.	Track changes to articles 10, 11 and 13 and these schedules are presented in Appendix 12 (document reference 8.5.3.12). If PC-02 is accepted, Crown Rights article will be added and article 6 and 20(5)) amends will be included in the full clean and full track changed update to the DCO
3.2	OD-007	Explanatory Memorandum	Changes arising from PC-02	Track changed version of Part 5 of this document (being the only

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
				part of it that has changed) presented in Appendix 13 (document reference 8.5.3.13). If the Proposed Change is accepted, the EM would be updated in clean and track changes form to account for these changes, the changes above in relation to Crown Rights and article 6 and 20(5) and those in the DCO submitted alongside the Applicant's Response to

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
				Relevant Representations.
4.1	OD-008	Statement of Reasons Addendum	Addendum to include an update in relation to the CA Additional Land in line with CA Regulations requirements. This includes a Schedule of Negotiations at Annex 1.	Appendix 14 (document reference 8.5.3.14)
4.2	APP-016	Funding Statement Addendum	Addendum to include an update in relation to the CA Additional Land in line with CA Regulations requirements.	Appendix 15 (document reference 8.5.3.15)
4.3	AS-003	Book of Reference – Tracked Changes	Changes arising from PC-02 (including incorporation of Crown land)	This is presented in the full form of the document given its format and the CA Regulations requirements, in Appendix 16 (document reference 8.5.3.16).

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
4.3	AS-002	Book of Reference - Clean	Changes arising from PC-02 (including incorporation of Crown land)	This is presented in the full form of the document given its format and the CA Regulations requirements, in Appendix 17 (document reference 8.5.3.17).
6.3.5.1	OD-009	Construction Traffic Management Plan	Updated to include changes arising from PC-02	To be issued if Proposed Change is accepted
6.5	AS-027	Register of Environmental Assessments and Commitments	Updated to include changes arising from PC-02 - See Table 6-2 above	To be issued if Proposed Change is accepted to reflect the changes highlighted in Table 6-2 above.

Application Document Reference	PINS Document Reference	Application Document Name	Changes to Document (including sheet number where relevant)	Appendix No.
6.6.1	APP-180	Outline Landscape and Biodiversity Strategy	Updated to include measures proposed in this Report in relation to PC-02	To be issued if Proposed Change is accepted
6.10	APP-196	Biodiversity Net Gain Assessment	Updated to account for PC-01 and PC-02 and the biodiversity measures as part of them. Updated document will also account for the matters set out in the Applicant's response to Relevant Representations.	To be issued if Proposed Change is accepted

7. CONCLUSION

7.1. REQUEST FOR PROPOSED CHANGES TO THE PROPOSED SCHEME

7.1.1. This document explains the Applicant's Proposed Changes to the Proposed Scheme Application. It also requests that the ExA considers and accepts the Proposed Changes for inclusion into the Examination of the Application, whilst providing details to support the request.

7.2. MATERIALITY OF THE PROPOSED CHANGES

7.2.1. PC-01 has arisen due to additional information on the location of floodplain compensation provision. Since the Application was submitted, the Applicant has assessed solutions for floodplain compensation and has continued to engage with Interested Parties, such as the EA.

7.2.2. PC-02 has arisen as it has been identified that, in order to enable the proposed AIL route as set out within the Application, there is a conflict that needs to resolved with two electrical lines and the telecommunication line that oversail highways affected by the AIL route, necessitating works to facilitate changes to the infrastructure in place. Additional land and works powers are necessary to enable these electrical and telecommunications lines works and to remove a barrier to AIL deliveries whilst ensuring utilities provision is maintained.

7.2.3. The Applicant has concluded, following review and appraisal of the Proposed Changes in the context of the ES, that the Proposed Changes would not result in any new or materially different likely significant environmental effects or to any changes to the findings of the assessments presented in the ES and the FRA. The Proposed changes are also considered to be localised in nature; being, for PC-01, a small amount of works on land located adjacent to Drax's operations and owned by it; and which would be unlikely to be differentiated from the wider Proposed Scheme or operation of the Existing Drax Power Station; and for PC-02, involving a short and small amount of highways and utility works. Finally, it is considered that the changes do not change the substance of the Proposed Scheme for which development consent is sought.

7.2.4. The Applicant has confirmed above that PC-01 requires changes to the Order Limits, set out in the Application. The change to the Order Limits only affects land under the ownership of the Applicant.

7.2.5. The Applicant considers that the proposed changes for PC-02 includes the CA Additional Land, which invokes the CA Regulations and, accordingly, documents have been submitted with this Application as required under Figure 3 (5) of Advice Note 16 and Regulation 5 of the CA Regulations.

7.2.6. The Applicant understands that the question of whether the Proposed Changes are material or non-material is a matter of planning judgment for the Examining Authority.

However, having considered the Proposed Changes in the light of the characteristics outlined in the Guidance and in the context of the works required and the environmental appraisals, the Applicant is of the view that the changes it proposes as part of this Proposed Changes Application are **not** material, as set out in further detail above in Sections 5 and 6 of this document.

7.3. CONSULTATION WITH AFFECTED PERSONS AND INTERESTED PARTIES

7.3.1. The Applicant has outlined how it undertook consultation with affected persons and interested parties in **Section 3** of this document. The Applicant is of the view that its consultation on the proposed changes has been sufficiently extensive and robust to ensure that all persons who would wish to have an opportunity to comment on the proposed changes have had the opportunity to do so.

7.4. REQUEST FOR EXAMINING AUTHORITY'S ACCEPTANCE OF PROPOSED CHANGES TO THE PROPOSED SCHEME

7.4.1. In conclusion, the Applicant reiterates its request for acceptance by the Examining Authority of the two proposed minor, changes to the Proposed Scheme, on the basis of the supporting information set out in this Change Request.